

TITLE V APPLICATION REVIEW

Facility Name: **Conoco, Inc.**

City: Doraville

County: DeKalb

AIRS #: 04-13-089-00121

Application #: TV- 9395

Date Application Received: August 4, 1998

Date Application Deemed

Administratively Complete: September 29, 1998

Date of Draft Permit:

Permit No: 5171-089-0121-V-01-0

Program	Review Engineers	Review Managers
SSPP/ASU	Curt Churchill	James Current
SSCP/ASU	Travis Harris	James Eason
ISM P	Bob Scott	Richard Taylor
TOXICS	Art Stelson	Heather Abrams

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Title V operating permit. 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 proposed pursuant to: (1) Section 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 primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to Conoco and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the methods for determining compliance with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name Doraville Products Terminal
2. Parent/Holding Company Name Conoco, Inc.
3. Previous and/or Other Names Southern Facilities prior to 1987
4. Facility Location 2927 Woodwin Road
Doraville, Georgia 30360
5. Attainment or Non-attainment Area Location

Facility is located in an area designated as non-attainment for ozone.

6. Class I Area Impacts

There are no Class I areas within 100 km of this facility.

B. Site Determination

There are no applicable issues with regard to the site determination. There are no other facilities which could be considered contiguous or adjacent and under common control.

C. Existing Permits

Table 1: List of Current Permits, as Amended

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
5171-044-10779	June 7, 1991, amended September 13, 1991		U

Table 2: Comments on Specific Permits

Permit Number	Comments
	None

D. Process Description

1. SIC Code(s)

Major - 5171
Other - None

2. Description of Products: Petroleum bulk storage and terminal operation.
3. Overall Facility Process Description

Petroleum products such as diesel fuel and gasoline are received by pipeline and stored in one of ten large storage tanks at the facility. Seven tanks have internal floating roofs and three have fixed roofs. The floating roof tanks are allowed to store gasoline or less volatile products. The fixed roof tanks may only store less volatile products such as diesel fuel and kerosene. Three other small tanks, having a capacities 10,000 gallons or less, are located at the site and are used for additive storage. Products from the storage tanks are dispensed to tanker trucks through loading racks. Emissions from this operation are controlled by a vapor combustor (flare).

4. Overall Process Flow Diagram (optional) - see application.

E. Regulatory Status

1. PSD/NSR

Total tank storage at this facility is approximately 15 million gallons which is equal to about 360,000 barrels. PSD regulations name petroleum storage facilities with total capacities of greater than 300,000 barrels as one of the 28 named categories of sources whose annual emissions make them a PSD major source if they exceed 100 tons. Since Conoco is above this threshold, potential annual emissions for a pollutant emitted by this facility would only have to exceed 100 tons before it would be considered a major source for PSD purposes. Potential annual emissions of VOCs from this source have been calculated to be just under 170 tons. These calculations were made using the permitted emission rate for the terminal of 35 mg/liter of gasoline loaded with a maximum annual throughput of 625,464,000 gallons. This facility would be considered a major source under PSD regulations, however, this facility is located in DeKalb County which is part of the metro Atlanta ozone non-attainment area. Therefore, the NSR regulations would be applicable instead of PSD, since VOCs are the major pollutant emitted and this is one of the two pollutants regulated for ozone non-attainment areas. Conoco would be considered major for NSR purposes since their potential VOC emissions exceed 50 tons per year. Their nitrogen oxide emissions however, are less than 50 tons per year. Nitrogen oxide is the second pollutant regulated for ozone non-attainment areas.

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	U			U
PM ₁₀	U			U
SO ₂	U			U
VOC	U	U		
NO _x	U			U

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	U			U
TRS	n/a			U
H ₂ S	n/a			U
Individual HAP	U			U
Total HAPs	U			U

3. MACT Standards

This facility is not major for HAPs since potential total HAP emissions are only about 19.6 tons per year and no individual HAP is potentially emitted at a rate of more than 8.4 tons per year. The major source thresholds for total and individual HAPs are 25 and 10 tons respectively.

4. Program Applicability

Program Code	Applicable (Yes/No)
Program Code 6 - PSD	no
Program Code 8 - Part 61 NESHAP	no
Program Code 9 - NSPS	yes
Program Code M - Part 63 NESHAP	no
Program Code V - Title V	yes

II. Facility Wide Requirements

A. Emission and Operating Caps: Conoco, Inc. has no facility wide emission or operating caps.

B. Applicable Rules and Regulations:

1. Facility Wide Federal Rule Standards

Not Applicable

2. Facility Wide SIP Rule Standards:

Because the facility is located in DeKalb county and they handle and store gasoline, the facility is subject to Georgia Rule for Air Quality Control 391-3-1-.02(2)(bbb). The requirements of this rule are as follows:

- a. Effective June 1, 1999, the Reid vapor pressure of the gasoline at the facility shall not exceed 7.0 psi.

from June 1 to September 15. The facility may also blend ethanol into their gasoline, and if it is, the Reid vapor pressure shall not exceed 8.0 psi., the percent composition of the ethanol must be between 9 and 10 percent (not including any denaturing agent), and any document that accompanies the shipment of gasoline must state that the gasoline has ethanol and the percent composition.

- b. Effective April 1, 1999, the sulfur content of the gasoline shall not exceed an average 150 ppm (by weight).
- c. Effective April 1, 2003, the sulfur content of the gasoline shall not exceed an average 30 ppm (by weight).
- d. Effective April 1, 2003, the olefin content of the gasoline shall not exceed an average 4 percent (by weight).
- e. Effective April 1, 2003, the aromatic hydrocarbon content of the gasoline shall not exceed an average 22 percent (by weight).

C. Compliance Status: See Section VII.F.

D. Operational Flexibility: See Section VII.A.

E. Permit Conditions

No other facility-wide conditions are included in the permit other than the general provisions in Part VIII, Rule 391-3-1-.02(2)(a), which applies to all air contaminant sources in the state and a condition requiring the facility to comply with the gasoline volatility requirements of Rule 391-3-1-.02(2)(bbb), which applies to all facilities which store gasoline in the metro Atlanta ozone nonattainment area.

No comments were made in section 3.2 of the application regarding existing permit conditions, and no changes to any of the existing conditions were requested.

III. Regulated Equipment Requirements

A. Brief Process Description

Conoco operates a bulk terminal with total storage capacity of approximately 15 million gallons. The facility emission sources consist of seven main regulated storage tanks, three large fixed roof tanks, three small additive tanks (for a total of 13 tanks), a truck loading rack, a vapor combustion unit (VCU), and various fugitives and insignificant activities. The terminal receives petroleum products by pipeline and ships out product by tank truck to retailers and bulk plants. Volatile organic compounds (VOC) and Hazardous Air Pollutant (HAP) emissions result primarily from loading trucks and storage tank losses.

B. Equipment List for the Process

TITLE V APPLICATION REVIEW

Unit I.D.	Source Description	Pollutants Emitted	Applicable Rule/reg	Fed. Enf. ?
D001	Internal Floating Roof Tank	VOC, HAPs	391-3-1-.02(2)(bb)	yes
D002	Internal Floating Roof Tank	VOC, HAPs	391-3-1-.02(2)(bb)	yes
D005	Internal Floating Roof Tank	VOC, HAPs	391-3-1-.02(2)(bb)	yes
D006	Internal Floating Roof Tank	VOC, HAPs	391-3-1-.02(2)(bb)	yes
D008	Internal Floating Roof Tank	VOC, HAPs	391-3-1-.02(2)(bb)	yes
D009	Internal Floating Roof Tank	VOC, HAPs	391-3-1-.02(2)(bb)	yes
D010	Internal Floating Roof Tank	VOC, HAPs	391-3-1-.02(2)(bb)	yes
D020	Gasoline Loading Rack	VOC, HAPs	391-3-1-.02(2)(cc), (ss), 40 CFR 60, Subpart XX	yes
D021	Vapor Combustion Unit (flare)	PM, NO _x , CO, VOC, HAPs	391-3-1-.02(2)(cc), 40 CFR 60, Subpart XX	yes
D022	Component Fugitives (valves, flanges, pump seals)	VOC, HAPs		n/a

C. Equipment & Rule Applicability

! Emission and Operating Caps - None

! Applicable Rules and Regulations - Following is an overview of the specific rules and regulations that apply to this facility.

Georgia Rule (bb), applies to tanks D001, D002, D005, D006, D008, D009 and D010, since each of these tanks has a capacity of more than 40,000 gallons and is capable of storing a product with a vapor pressure of greater than 1.52 psia (i.e. they are equipped with floating roofs). The other tanks at this facility which have volumes of greater than 40,000 gallons, Tanks D003, D004 and D007, have only fixed roofs and may not store the volatile products that would subject it to this Rule. Rule (bb) requires that these tanks be equipped with floating roofs.

Georgia Rule (cc), applies to all gasoline terminals in the State and covers the terminal or loading rack portion of this facility. Gasoline terminal is defined in the Rule as a facility which receives gasoline by pipeline, dispenses it to trucks and has an average daily throughput of greater than 20,000 gallons. Conoco meets all of these criteria and must therefore, have a control system with an efficiency of at least 90 percent. Although this Rule also mandates a maximum emission rate of no more than 80 milligrams per liter of gasoline loaded

at the terminal, this emission limit is superseded by the 35 milligrams per liter standard of the NSPS regulation to which this facility is also subject.

Georgia Rule (ss), applies to any entity involved in the loading or unloading of gasoline into gasoline transport vehicles, which is Conoco's primary business at this facility. Conoco must therefore, take steps to insure that they only load gasoline into tanker trucks that have passed a vapor tightness test to ensure that they do not leak. This Rule is also automatically applicable to any facility that is subject to Rule (cc).

40 CFR 60, Subpart XX, applies to any gasoline terminal constructed or modified after December 17, 1980. Having modified the terminal after this date, Conoco must meet the emission limit for this regulation of 35 milligrams (of VOCs) per liter of gasoline loaded. In addition to the emission limit, this regulation requires certain equipment standards to ensure a vapor tight loading system and requires that the terminal only load gasoline into tanks that have been tested and shown to be vapor tight. Record keeping to ensure compliance with these requirements is also required.

D. Compliance Status: See Section VII.F.

E. Operational Flexibility: See Section VII.A.

F. Permit Conditions

- 3.3.1 Requires that gasoline only be loaded into vapor tight trucks and that records be kept by Conoco to ensure compliance with this requirement. This requirement is taken directly from Subpart XX.
- 3.3.2 Limits emissions from the vapor control system to 35 milligrams per liter of gasoline loaded, is required by 40 CFR 60, Subpart XX and compliance with this regulation is mandated by the existing permit.
- 3.4.1 A State only enforceable condition which was carried over from the existing permit. It has been included to reduce the standing and breathing losses from the gasoline storage tanks by reducing the amount of radiant solar energy transferred to the tank which raises the operating temperature of the tank.
- 3.4.2 Requires compliance with Rule (bb), a condition carried over from the existing permit.
- 3.4.3 Requires compliance with Rule (cc), another condition carried over from the existing permit, but with the actual requirements added into the permit.
- 3.4.4 Requires compliance with Rule (ss), as with condition 3.4.3, another condition carried over from the existing permit with the actual requirements added into the permit.
- 3.5.1 Requires routine maintenance on all air pollution control equipment and is condition 11 of the existing permit carried over without change.
- 3.5.2 Requires the keeping of a spare parts inventory for the control equipment and is condition 12 of the existing permit carried over without change.

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

The company is required to conduct a performance test at any specified emission point when so directed by the Environmental Protection Division (“Division”). The test results must be submitted within 30 days of the completion of the testing. Performance and compliance tests must be conducted and data reduced in accordance with applicable procedures and methods. Before any performance test is performed, a written notification and test plan will be submitted.

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

Any monitoring system installed by the Permittee is required to be in continuous operation except during periods of repair. Maintenance and repair is required to be conducted in an expedient manner. The company is required to operate a heat sensing device, acceptable to the Director, such as a UV beam sensor or thermocouple, to continuously indicate and record the presence of a flame. Written reports of deviations from this value and monitor malfunctions will be submitted for each semiannual period, 30 days after the last day of June and December. Each report will include: total process operating time, the magnitude of all deviations, corrective action, the nature, cause and duration of any malfunction.

In accordance with Subpart XX and enhanced monitoring guidelines each calendar month the company will perform a leak inspection to seal/eliminate any leaks found in the vapor collection-processing systems or loading racks handling gasoline.

In accordance with Rule (ss) and Subpart XX, the permit requires the facility to monitor vapor tightness documentation for all tanker trucks loaded at the terminal, and is required to report when fuel is loaded in tanks that have not passed this test.

Files of all measurements, including continuous monitoring systems, monitoring devices, and performance testing measurements; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices. These files are required to be maintained for a period of at least five (5) years.

VI. Other Record Keeping and Reporting Requirements

Records are required to be retained for a period of five years. The records are required to be kept in a permanent form suitable for inspection and submission to the Division and EPA. The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all related information pertaining to deviations from applicable requirements.

VII. Specific Requirements

A. Operational Flexibility

Operational flexibility does not need to be incorporated into this Title V Permit. The applicant did not include any alternative operating scenarios in their Title V Application.

B. Alternative Requirements

There are no alternative requirements that need to be incorporated into the Title V Permit.

C. Insignificant Activities

Insignificant activities are listed in Attachment B of the permit and in section 4.10 of the Title V permit application.

D. Temporary Sources

Conoco did not request the permitting of any temporary sources.

E. Short-Term Activities

Conoco listed only groundwater/soil vapor extraction, which occurs twice per month and would be considered fugitive emissions.

F. Compliance Schedule/Progress Reports

The facility is considered to be in compliance with all Air Quality Regulations. Therefore, no compliance schedule or progress reports are necessary.

G. Emissions Trading

This facility is not involved in any emissions trading programs.

H. Acid Rain Requirements

This facility is not subject to any requirements of Title IV of the Clean Air Act Amendments (acid rain).

I. Prevention of Accidental Releases

This facility has indicated that they have no substances which are stored in quantities above the threshold for the Accidental Release Prevention Program.

J. Stratospheric Ozone Protection Requirements

The facility is not subject to Title VI requirements.

K. Pollution Prevention

There are no pollution prevention provisions incorporated into this Title V Permit.

L. Specific Conditions - None

VIII. General Provisions

TITLE V APPLICATION REVIEW

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Addendum to Narrative

Part 3.0

Condition 3.3.1 b. vi.

A typographical error was corrected, (c)(i) was changed to (b)(i).

Condition 3.4.4

Conoco had three separate comments on this condition, however, its language is taken directly from the Georgia Rules for Air Quality Control. Since this condition contains no requirements other than those of Rule 391-3-1-.02(2)(ss), to which this facility is subject, no changes are being made.

Part 4.0

Condition 4.1.3

Conoco requested that the test methods required by 40 CFR 60.18 be added to this condition as one of the methods to be used to determine compliance when this facility is tested. However, the Industrial Source Monitoring Program has stated that this is unnecessary since the test methods already listed in this condition cover 60.18 requirements. Further, it is believed that this section is not applicable to this facility, since although this facility is subject to 40 CFR 60, Subpart XX, Subpart XX does not mention section 60.18. The introduction to 60.18 states that it only applies to Subparts that specifically reference it.

Part 5.0

Condition 5.1.1

Conoco wanted it clarified that this condition applies to continuous monitoring systems. This change has been made in this permit as well as in the permit template.

Condition 5.2.1

Conoco requested that this condition be modified to reflect the actual monitoring system at their terminal. Since their system will accomplish the monitoring purposes intended, some changes were made to this condition. The words "heat sensing" have been deleted, since any means of flame detection is acceptable. Conoco uses an electric eye to detect the flame and have an interlock system that prevents the loading of gasoline if a flame is not detected. The use of the interlock system has been required. Condition 5.3.7, the corresponding monitoring condition, was also modified to be consistent, and now requires that instances of gasoline loading without a flame detection be recorded as excursions.

Condition 5.2.2

The last sentence of this condition which required the use of an organic vapor measurement device has been deleted as requested by Conoco. This condition now matches the NSPS requirements. The vapor analyzer is intended only to be used during compliance testing.

Condition 5.2.3

This condition has also been modified and the language suggested by Conoco partially adopted. The intent of the condition has not been changed, the meaning has only been clarified. A minor change, correcting the citation, was also made.

Condition 5.3.6

This condition requires that each leak found during required monthly inspections, instances of nonvapor-tight truck loadings, leaks not repaired within a certain time frame and excess emissions caused by pressure-vacuum vents opening, each be reported as exceedances. Conoco requested that the language of this condition be changed so that only the leaks detected which were not repaired within the required time frame had to be reported as exceedances. However, no changes are being made, as this type of reporting is consistent with the requirements of Title V permitting.

Condition 5.3.7

See the comments under condition 5.2.1.