

Facility Name: **Motiva Enterprises LLC – Doraville Sales Terminal**  
 City: Doraville  
 County: DeKalb  
 AIRS #: 04-13-089-00131

Application No.: TV-17089  
 Date Application Received: November 21, 2006  
 Permit No.: 5171-089-0131-V-02-0

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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## **Introduction**

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained herein simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to Motiva Enterprises LLC 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, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

**I. Facility Description****A. Facility Identification**

1. Facility Name: Motiva Enterprises - Doraville Terminal

2. Parent/Holding Company Name

Motiva Enterprises, LLC

3. Previous and/or Other Name(s)

Originally this facility operated and was permitted as three separate terminals, owned by three separate companies. There was a Texaco, Inc terminal located at 4127 Winters Chapel Road, an Exxon Corporation terminal at 4143 Winters Chapel Road and an Ashland Petroleum terminal at 4201 Winters Chapel Road. In 1997 Shell Oil Products Company purchased the Ashland. A short time later, in late 1998 or early 1999, Shell Oil purchased the adjacent Exxon terminal and shortly thereafter merged with Motiva. Motiva is a limited liability partnership of Shell, Texaco and Saudi Aramco. After the merger with Motiva, the Shell terminal (formerly Ashland) was re-permitted as Motiva Enterprises. The terminal which started out as Texaco, Inc. was subsequently permitted as Texaco Refining and Marketing, Inc., then as Star Enterprises before it was acquired by Motiva and permitted as Motiva Enterprises, LLC in 1999. Prior to the merger of Motiva and Shell, the Motiva terminal (formerly Texaco or Star Enterprises) operated as a major source, the two Shell terminals (formerly Ashland and Exxon) were synthetic minor sources for both VOCs and HAPs.

4. Facility Location

4127 Winters Chapel Road  
Doraville, Georgia 30360 (DeKalb County)

4143 Winters Chapel Road  
Doraville, Georgia 30360 (DeKalb County)

4201 Winters Chapel Road  
Doraville, Georgia 30360 (DeKalb County)

5. Attainment, Non-attainment Area Location, or Contributing Area

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

**B. Site Determination**

There are no site determinations issues with this Title V renewal permit.

### C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
5171-089-0131-V-01-0	May 22, 2002	Initial Title V Permit.
5171-089-0131-V-01-1	December 13, 2004	502(b)(10) amendment to allow ethanol storage and handling.

### D. Process Description

#### 1. SIC Code – 5171 Petroleum Products

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

#### 2. Description of Product(s)

Bulk Petroleum Terminal and Petroleum Products and ethanol handling.

#### 3. Overall Facility Process Description

The Doraville Terminal Complex is located at Winters Chapel Road in Doraville, Georgia. The facility operates as a typical bulk storage terminal for gasoline and middle distillates fuels, and as a regional distribution facility of lube oil, antifreeze and fuel additives.

The terminal receives gasoline and middle distillates fuel via shipments through a common carrier pipeline and trucks. Gasoline and middle distillates receipts are diverted into aboveground gasoline and middle distillates storage tanks. Fuel additives, which are received via tanker truck or railcar are routed to the appropriate additive tanks. There are three main loading racks, namely, east (old Exxon loading rack), west (old Shell loading rack), and south (old Star/Texaco loading rack). There is also a lube oil rack, which also handles anti-freeze, but not gasoline or distillate oil. The gasoline, middle distillates fuel,

ethanol and additives are pumped to west and south loading racks equipped with vapor collection systems and a vapor combustion unit (VCU). Only middle distillates and ethanol are loaded via the east loading rack. Vapors emitted from the middle distillates loading are not controlled due to the low volatility associated with middle distillates and are insignificant. Both the west and south loading racks are also equipped with carbon adsorbtion units that are used as backup control devices for the VCUs.

The facility also serves as a lube oil and antifreeze distribution center for Texaco. Lube oils and antifreeze are received via railcar and stored in fourteen tanks co-located at the Motiva terminal. These products may either be loaded to tanker trucks via a separate loading system comprised of 9 risers or to 55-gallon drums. Vapors emitted from lube oil loading are not controlled due to the low volatility associated with lube oils and antifreeze. Air emissions from lube oil and antifreeze handling are insignificant.

An emission inventory was conducted to identify and quantify all listed air pollutants emitted from the facility. The significant emission units at the facility are the storage tanks, the loading racks and emission control devices, and the product handling equipment (such as pumps, valves connection fittings, and flanges). The emissions are due to breathing and working losses for the storage tanks; vapor displacement and leaks for the loading rack; and fugitive leaks for the product handling equipment.

## **STORAGE TANKS**

Storage tanks within the tank farms are used for the storage and transfer of petroleum products and additives. Emissions from storage tanks result from standing (breathing) and working losses. The standing and working losses are calculated using the expected maximum potential product throughputs for each tank. Tank-specific throughputs for each tank were obtained by assuming that the expected maximum gasoline throughput (425 million gallons) goes through each gasoline tank, and that the maximum facility middle distillates (398.2 million gallons) fuel throughput goes through each middle distillates fuel tank. The annual throughput was assumed to be distributed evenly over the 12-month period. This is a very conservative method of estimating emissions and results in estimates above what would be allowed by the actual permit. This facility has eleven large gasoline storage tanks. Assuming each tank had a throughput of 425 million gallons annually results in total throughput many times higher than the facility throughput limit contained in this permit of 650 million gallons annually. Tank nos. 25599 and 25601 were external floaters that are now equipped with geodesic dome roofs and emissions from these tanks were calculated as domed externals. This permit also allows the installation of a floating roof for tank no. 12, which will now be able to store gasoline. No significant change in emissions is expected from this modification.

## **LOADING RACK AND VAPOR CONTROL DEVICES**

The terminal has four loading racks, namely east, west, south and lube oil loading racks. The west and south loading racks load gasoline and middle distillates while the east loading rack loads only middle distillates. The lube oil loading rack loads lube oil and anti-freeze. Only the gasoline and middle distillate fuels loading racks (i.e., west and

south) have an associated vapor collection system, which must be connected in order for the petroleum fuel pumps to operate. The east and the lube oil loading racks do not need a vapor collection system since the volatility of the material loaded is very low. The only emissions attributable to the west and south loading racks are the VOC and volatile HAP emissions resulting from loading into leaking tank trucks (all other loading rack emissions must be routed to a vapor control device).

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

Total tank storage at this facility is approximately 26 million gallons which is equal to about 640,000 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. However, since Motiva is limited below this threshold, it would not be considered a major source for PSD purposes. Potential annual emissions of VOCs from this source have been calculated to be about 76 tons. These calculations were made using the permitted emission rate for the terminal of 10 mg/liter of gasoline loaded with a maximum annual throughput of gasoline of 650,000,000 gallons. Although this facility would not be considered a major source under PSD regulations, 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. Motiva would be considered major for NSR (and Title V permitting) purposes since their potential VOC emissions exceed 25 tons per year. Their nitrogen oxide emissions however, are less than 25 tons per year. Nitrogen oxide is the second pollutant regulated for ozone non-attainment areas.

2. Title V Major Source Status by Pollutant

**Table 2: 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	No			
PM <sub>10</sub>	No			
SO <sub>2</sub>	No			
VOC	Yes	Yes		
NO <sub>x</sub>	Yes			Yes
CO	Yes			Yes
TRS	n/a			
H <sub>2</sub> S	n/a			
Individual HAP	Yes		Yes	
Total HAPs	Yes		Yes	

3. MACT Standards

This facility is not major for HAPs, with the synthetically minor limiting permit conditions (2.2.1, 3.2.1, 3.2.2), since potential total HAP emissions are only about 9.1 tons per year and no individual HAP is potentially emitted at a rate of more than 5.5 tons per year. The major source thresholds for total and individual HAPs are 25 and 10 tons respectively.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
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

**Regulatory Analysis****II. Facility Wide Requirements****A. Emission and Operating Caps:**

Emission and operating caps specified in Permit No. 5171-089-0131-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

**B. Applicable Rules and Regulations**

None applicable.

**C. Compliance Status**

This facility does not have any noncompliant units or groups.

**D. Operational Flexibility**

Not applicable.

**E. Permit Conditions**

2.2.1 Limits HAP emissions to ensure non-applicability of 40 CFR 63, Subpart R.

### III. Regulated Equipment Requirements

#### A. Brief Process Description

A brief process description is specified in the narrative for Title V Permit No. 5171-089-0131-V-01-0. Please refer to this narrative. The only changes that have occurred since then were the permitting of ethanol handling in 2004 and the conversion of tank no. 12 to a floating roof tank, which is allowed by this permit.

#### B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	Description
1	Internal Floating Roof Tank	391-3-1-.02(2)(bb)	3.4.1, 3.4.4	Mechanical shoe primary seal
2	Internal Floating Roof Tank	391-3-1-.02(2)(bb)	3.4.1, 3.4.4	Mechanical shoe primary seal
4	Internal Floating Roof Tank	391-3-1-.02(2)(bb)	3.4.1, 3.4.4	Mechanical shoe primary seal Rim-mounted secondary seal
11	Internal Floating Roof Tank	391-3-1-.02(2)(bb)	3.4.1, 3.4.4	Mechanical shoe primary seal
12	Internal Floating Roof Tank	391-3-1-.02(2)(bb), 40 CFR 60, Subpart Kb	3.3.3, 3.4.1, 3.4.4, 5.2.9, 5.2.10, 5.2.11, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10	Mechanical shoe primary seal Rim-mounted secondary seal
13	Internal Floating Roof Tank	391-3-1-.02(2)(bb)	3.4.1, 3.4.4	Vapor-mounted primary seal Rim-mounted secondary seal
14	Internal Floating Roof Tank	391-3-1-.02(2)(bb)	3.4.1, 3.4.4	Vapor-mounted primary seal Rim-mounted secondary seal
15	Internal Floating Roof Tank	391-3-1-.02(2)(bb)	3.4.1, 3.4.4	Mechanical shoe primary seal Rim-mounted secondary seal
25599	Domed External Floating Roof Tank	391-3-1-.02(2)(bb)	3.4.1, 3.4.4	Mechanical shoe primary seal
25601	Domed External Floating Roof Tank	391-3-1-.02(2)(bb)	3.4.1, 3.4.4	Mechanical shoe primary seal
25602	Internal Floating Roof Tank	391-3-1-.02(2)(bb)	3.4.1, 3.4.4	Mechanical shoe primary seal
31511	Internal Floating Roof Tank	391-3-1-.02(2)(bb)	3.4.1, 3.4.4	Mechanical shoe primary seal Rim-mounted secondary seal
31723	Internal Floating Roof Tank	391-3-1-.02(2)(bb), 40 CFR 60, Subpart K	3.3.1, 3.4.1, 3.4.4	Mechanical shoe primary seal Rim-mounted secondary seal
South Rack	Gasoline Loading Rack	391-3-1-.02(2)(ss) 391-3-1-.02(2)(cc)	3.2.1, 3.2.2, 3.4.2, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 5.2.1, 5.2.2, 5.2.4, 5.2.5, 5.2.6, 5.2.7, 5.3.1, 5.3.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4	APC1 - Vapor Combustion Unit (flare) or Vapor Recovery Unit (carbon adsorber)
West Rack	Gasoline Loading Rack	391-3-1-.02(2)(ss) 391-3-1-.02(2)(cc) 40 CFR 60, Subpart XX	3.2.1, 3.2.2, 3.3.2, 3.4.2, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 5.2.1, 5.2.2, 5.2.3, 5.2.5, 5.2.6, 5.2.8, 5.3.1, 5.3.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5	APC2 - Vapor Combustion Unit (flare) or Vapor Recovery Unit (carbon adsorber)

\* Generally applicable requirements contained in this permit may also apply to emission units listed above.

### C. Equipment & Rule Applicability

Equipment and Rule Applicability specified in Permit No. 5171-089-0131-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative. This facility has also become subject to 40 CFR 60, Subpart Kb by modifying tank no. 12.

Emission and Operating Caps: See Section II.A.

#### Rules and Regulations Assessment:

Georgia Rule (bb) applies to tanks 1, 2, 4, 11, 12, 13, 14, 15, 25599, 25601, 25602, 31511, and 31723 since they have capacities of more than 40,000 gallons and are capable of storing a product with a vapor pressure of greater than 1.52 psia (i.e. they are equipped with floating roofs). Rule (bb) requires that these tanks be equipped with floating roofs. Other tanks at this facility which have volumes of greater than 40,000 gallons, have only fixed roofs and may not store the volatile products that would subject them to this Rule. Tanks 25599 and 25601 are formerly external floating roof tanks which have been equipped with geodesic domes, making them internal floaters and subject to Rule (bb) instead of Rule (nn).

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. Motiva 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 terminals, this emission limit is superseded by the 35 milligrams per liter standard of the NSPS regulation at the west loading rack. However, this limit in turn is superseded by the 10 milligrams per liter limit the facility has voluntarily taken as a MACT avoidance condition for both of the gasoline loading racks.

Georgia Rule (ss) applies to any entity involved in the loading or unloading of gasoline into gasoline transport vehicles, which is Motiva's primary business at this facility. Motiva 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. Since the West loading rack was modified after this date, Motiva must meet the emission limit for this regulation of 35 milligrams (of VOCs) per liter of gasoline loaded (although they have voluntarily taken a stricter limit of 10 mg/liter). 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.

40 CFR 60, Subpart K, is a federal standard of performance for petroleum storage vessels constructed after June 11, 1973 and prior to May 19, 1978 (when Subpart Ka would begin to apply) that have storage capacities of greater than 40,000 gallons. Tank 31723 meets these criteria and as a result must be equipped with a floating roof.

40 CFR 60, Subpart Kb, is a federal standard of performance for volatile organic liquid storage vessels constructed (or modified) after July 23, 1984 that have storage capacities of greater than 10,000 gallons. Tank 12 meets these criteria and as a result must be equipped with a floating roof, keep storage records and conduct periodic inspections.

D. Compliance Status

Motiva is operating in compliance with all of the rules or regulations described above.

E. Operational Flexibility

See Section VII.A.

F. Permit Conditions

- 3.2.1 Limits gasoline and ethanol throughput at the terminal to 650,000,000 gallons and distillate fuel to 398,160,000 gallons during any consecutive 12-month period.
- 3.2.2 Limits emissions from the vapor control systems to 10 milligrams per liter of gasoline loaded. Motiva has requested this limit to keep the combined facility synthetically minor for HAPs.
- 3.3.1 Requires Tank 31723 comply with Subpart K of 40 CFR 60. This was an existing permit condition which has been carried over into the Title V permit.
- 3.3.2 For the west loading rack, this condition requires that gasoline only be loaded into vapor tight trucks and that records be kept by Motiva to ensure compliance with this requirement. These requirements are taken directly from Subpart XX.
- 3.3.3 Requires Tank 12 comply with Subpart Kb of 40 CFR 60. This condition is being added due to the modification of this tank and a change in its method of operation.
- 3.4.1 Requires compliance with Rule (bb), a condition carried over from the existing permit.
- 3.4.2 Requires compliance with Rule (cc), another condition carried over from the existing permit.
- 3.4.3 Requires compliance with Rule (ss), another condition carried over from the existing permit.
- 3.4.4 A State only enforceable condition, which was historically included in all gasoline tank farm permits. 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.
- 3.5.1 Requires routine maintenance on all air pollution control equipment and is a traditional condition included in SIP permits.

- 3.5.2 Requires the keeping of a spare parts inventory for the control equipment and is a traditional condition included in SIP permits.
  
- 3.5.3 A condition which requires that the backup control equipment for the gasoline loading racks be operated whenever the primary system is not in operation and that the loading of gasoline not occur if both the primary and secondary control devices are not in operation. Other gasoline terminals are required to have an interlock system that prevents the loading of gasoline if their control device is not in operation since they do not have backup control devices as does Motiva. This condition is in lieu of requiring the interlock systems.

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

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

**B. Specific Testing Requirements****1. Individual Equipment**

Testing requirements specified in Permit No. 5171-089-0131-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

**2. Equipment Groups (all subject to the same test requirements):**

None applicable.

## V. Monitoring Requirements

### A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

### B. Specific Monitoring Requirements

#### 1. Individual Equipment:

Monitoring requirements specified in Permit No. 5171-089-0131-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Due to modifications being permitted for tank no. 12, three new monitoring conditions have been added to the permit, which apply only to this tank. The permittee must keep records of the true vapor pressure of materials stored in this tank, perform annual inspections of its seals and inspect and repair the roof, seals and gaskets each time the tank is emptied. These requirements are all taken from 40 CFR 60, Subpart Kb.

#### 2. Equipment Groups (all subject to the same monitoring requirements):

None applicable.

### C. Compliance Assurance Monitoring (CAM)

Motiva Enterprises – Doraville Sales Terminal operates two gasoline loading racks, which could be considered *pollutant specific emission units* (PSEUs) per Part 64 because they are (1) subject to a pollutant emission standard for which there is a control device, and (2) the pre-controlled potential emissions for the pollutant is greater than the major source threshold.

Although not included with their initial Title V application, a CAM plan was requested and was received on September 10, 2007. Motiva proposed using the continuous monitoring of the presence of a flame in their vapor combustors as the primary indicator of compliance. Monitoring of system pressure will be the secondary indicator. EPD agrees with the proposed terms specified in the CAM plan and makes the performance criteria permit condition nos. 5.2.6 and 5.2.7 of the proposed renewed Permit. The monitoring of flame presence and vapor system collection pressure are already required by conditions 5.2.1 and 5.2.5, respectively.

**VI. Record Keeping and Reporting Requirements****A. General Record Keeping and Reporting Requirements**

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 information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

**B. Specific Record Keeping and Reporting Requirements**

Record keeping and reporting requirements specified in Permit No. 5171-089-0131-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

In addition to the specific record keeping requirements of the initial Title V permit a requirement was added in the 2004 502(b)(10) amendment to keep records of ethanol throughput. This was done by modifying a condition, which already required records be kept of gasoline throughput. This requirement is found in condition 6.2.4.

Five new conditions have also been added to this permit, all of which contain requirements taken from 40 CFR 60, subpart Kb and also which only apply to tank no. 12. These are conditions 6.2.6 through 6.2.10. These conditions require records be kept of the liquids stored in this tank, records be kept of inspections made of this tank and its seals and certain notifications be made to the Director regarding problems found during the inspections and to give the Division an opportunity to inspect this particular tank when it is empty.

**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 -Not applicable.****C. Insignificant Activities**

Insignificant activities are listed in Attachment B of the permit and in sections D.1 and D.6 of the Title V permit application. Section D.1 showed 22 petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 psia as stored. Since tank 12 is being modified by the addition of a floating roof, it has been moved to table 3.1 in the permit and this number has been reduced to 21 in appendix B of the permit.

**D. Temporary Sources**

Motiva did not request the permitting of any temporary sources.

**E. Short-Term Activities**

Motiva did not request the permitting of any short-term activities.

**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 - Not applicable.****H. Acid Rain Requirements**

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

**I. Stratospheric Ozone Protection Requirements**

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

**J. Pollution Prevention - Not applicable.****K. Specific Conditions - Not applicable.**

**VIII. General Provisions**

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.