

Facility Name: **Plantation Pipeline Company – Bremen Tank Farm**

City: Bremen

County: Haralson

AIRS #: 04-13-143-00017

Application #: TV-14610

Date SIP Application Received: N/A

Date Title V Application Received: July 18, 2003 and March 16, 2006 update

Permit No: 4613-143-0017-V-01-1

Program	Review Engineers	Review Managers
SSPP	S. Ganapathy	Richard McDonald
SSCP	n/a	n/a
ISMP	n/a	n/a
TOXICS	n/a	n/a

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
4613-143-0017-V-01-0	June 26, 2003	✓	

Table 2: Comments on Specific Permits

Permit Number	Comments
4613-143-0017-V-01-0	Initial Title V Permit for Plantation Pipeline’s Bremen Tank Farm

B. Regulatory Status

1. PSD/NSR/RACT

Total tank storage at this facility is approximately 1.3 million 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. Therefore, Plantation would be considered a major source for PSD purposes. Actual annual emissions of VOCs from this source have been estimated to be about 658 tons. This facility is located in Haralson County, which is outside of the metro Atlanta ozone non-attainment area. Therefore, the NSR regulations would not be applicable. The facility’s existing Title V Permit does not have any PSD/NSR avoidance conditions.

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	n/a			
PM ₁₀	n/a			
SO ₂	n/a			
VOC	yes	✓		
NO _x	n/a			
CO	n/a			

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
TRS	n/a			
H ₂ S	n/a			
Individual	yes	✓		
Total HAPs	yes	✓		

II. Proposed Modification

A. Description of Modification

The facility planned to replace the liquid mounted foam log primary seal with a more durable mechanical shoe seal on Tank No. 127 (Source ID: T127). The Permittee also notified EPD on July 21, 2003 of its intent to install and operate an additional auxiliary air stripper in order to treat and discharge excess waters collected at the facility. The existing Air Stripper (STRP) is listed as an insignificant source in Attachment B of the facility’s existing Permit No. 4613-143-0017-V-01-0 dated June 26, 2003. Hence, the proposed addition of a air stripper is also expected to be an insignificant source and is listed in Attachment B of the permit, which is updated in this 502(b)10 permit amendment. The permittee is not required to submit the actual increase in emissions for insignificant source additions.

On March 15, 2006 Plantation Pipeline submitted a 502(b)10 notification for some minor modification to the piping at the Bremen Tank Farm in order to meet EPA product quality standards during transportation of ultra low sulfur diesel fuel (ULSD) through its pipeline system. The piping modifications will prevent contamination of ULS by other distillate products that are also transported in the pipeline system. The modifications involve removal and reinstallation of valves and fitting at certain points along the facility manifolds to redirect the ULSD flow. The modifications will result in a small net increase in the number of valves and fittings associated with the fugitive emissions.

The proposed changes qualify as a 502(b)10 permit amendment to a Title V Permit since they do not constitute a modification under Title I of the federal act, will not exceed emissions allowed under the existing permit and will not result in any change to any existing condition of the facility’s current Title V Permit.

B. Emissions Change

The proposed seal replacement will not result in exceedances of any allowable emissions under the facility’s existing Title V Permit. However, the change is expected to result in an increase in working loss potential emissions of VOC for Tank No. 127 by 3.3 tons/year. The minor piping modification will result in increase of fugitive VOC emissions (potential emissions) from the increased number of valves and fittings by 0.004 tons/year. The existing Air Stripper (STRP) is an insignificant source/activity. The proposed air stripper is also an insignificant source/activity and VOC emission increase from the new stripper is expected to be insignificant and is not quantified in the permit application.

C. Title I Modification

- PSD/NSR Applicability

The modification is not subject to PSD or NSR since the potential increase in emission of VOC is 3.304 tpy, which is less than the significant increase of 40 tpy that would trigger a New Source Review (NSR).

- NSPS Modification

The change is not an NSPS modification since the replacement of the liquid mounted foam log primary seal with the more durable mechanical seal in Tank 127 can be considered routine maintenance, repair and replacement which is exempt from the definition of Modification in 40 CFR 60.14. Hence Tank 127 does not become subject to 40 CFR 60 Subpart Kb due to the seal replacement.

- NESHAP Modification

The change is not a modification under Part 61 as Tank 127 and the piping valve and fittings is not subject to provisions of Part 61.

III. Facility Wide Requirements

This change does not trigger any facility wide requirement.

A. Emission and Operating Caps

None applicable due to the proposed change.

B. Applicable Rules and Regulations

- Rules and Regulations Assessment – No new rules are triggered by the proposed changes.
- Emission and Operating Standards – Not applicable.

C. Compliance Status

The facility operates in compliance with all applicable rules and regulations.

D. Operational Flexibility

Not applicable.

E. Permit Conditions

No new permit conditions are added to the permit due to this replacement.

IV. Regulated Equipment Requirements

A. Brief Process Description

This change allows the facility to handle ultra low sulfur diesel fuel (ULSD) in its piping and tanks.

B. Equipment List for the New or Modified Process(es)

No new equipment is added in this permit amendment. The minor piping modifications involve a slight increase in the number of piping valves and fittings.

C. Equipment & Rule Applicability

- Emission and Operating Caps – Not applicable.
- Applicable Rules and Regulations -

There is no change in applicable rules and regulations due to the proposed change.

Emission and Operating Standards: None applicable.

D. Compliance Status

The facility is operating in compliance with all applicable rules and regulations.

E. Operational Flexibility

Not applicable.

F. Permit Conditions

No new permit conditions are added in this permit amendment due to the proposed changes.

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

- A. Individual Equipment: This replacement does not require any new testing of Tank 127.
- B. Equipment Groups (all subject to the same test requirements): Not applicable.

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

- A. Individual Equipment: No new monitoring requirements arise due to this proposed replacement and addition of pipe fittings and valves.
- B. Equipment Groups (all subject to the same monitoring requirements): Not applicable.

VII. Other Record Keeping and Reporting Requirements

Not applicable.

VIII. Specific Requirements

A. Operational Flexibility

Not applicable.

B. Alternative Requirements

None.

C. Insignificant Activities

No insignificant activities are added as part of this 502(b)(10) change

D. Temporary Sources

Not applicable.

E. Short-Term Activities

None.

F. Compliance Schedule/Progress Reports

Not applicable.

G. Emissions Trading

No emission trading is involved in this permit amendment.

H. Acid Rain Requirements

This amendment does not trigger Acid Rain Requirements.

I. Prevention of Accidental Releases

This modification does not change the source's applicability to Accidental Release regulation.

J. Stratospheric Ozone Protection Requirements

This modification does not change the source's applicability to Title VI

K. Pollution Prevention

Not applicable.

L. Specific Conditions

No new conditions are added in this permit amendment.