

Facility Name: Plantation Pipe Line Company
 City: Bremen
 County: Haralson County
 AIRS #: 04-13-143-00017

Application #: TV- 9151
 Date Application Received: October 21, 1996
 Date Application Deemed Administratively Complete: December 20, 1996
 Date of Draft Permit:
 Permit No: 4613-143-0017-V-01-0

Program	Review Engineers	Review Managers
SSPP	Curt Churchill	James Current
SSCP	Travis Harris	James Eason
ISMP	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 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 Amendments of 1990. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Chapter I 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 Plantation Pipe Line Company 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

The Facility Description may be presented in outline or narrative form. It must contain the information contained in each of the following subsections, preferably in a similar order.

A. Facility Identification

1. Facility Name: Plantation Pipe Line Bremen Tank Farm

2. Parent/Holding Company Name: Plantation Pipe Line Company

3. Previous and/or Other Name(s): None

4. Facility Location

US Highway 27 South, P.O. Box 665, Bremen, Georgia 30110

5. Attainment or Non-attainment Area Location

Facility is located in an area designated as attainment for all pollutants.

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
5171-071-3552-O	June 2, 1975, amended July 17, 1996 and October 20, 1999.	✓	

Table 2: Comments on Specific Permits

Permit Number	Comments
5171-071-3552-O	October 20, 1999 amendment issued after Title V application submittal.

D. Process Description

1. SIC Code: 4613

2. Description of Products: Plantation Pipe Line is a gasoline pipe line breakout station.

3. Overall Facility Process Description

Plantation Pipe Line Company is a pipeline breakout station with total storage capacity of approximately 1.3 million barrels. Plantation Pipe Line emission sources consist of 29 main regulated storage tanks, 3 contamination gasoline storage tanks and a water treatment storage tank. The terminal receives petroleum products by pipeline and ships out product by pipeline to gasoline terminals. Volatile organic compounds (VOCs) emissions result primarily from storage tank losses and from fugitive sources, such as flanges, valves and pump seals. Plantation Pipe Line’s operating schedule is 24 hours per day and 7 days per week.

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

E. Regulatory Status

1. PSD/NSR

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 existing SIP permit for this facility contains a PSD avoidance condition. Condition no. 6 limited VOC emissions from the construction of Tanks 176 and 177 to less than 40 tons per year, the PSD significance level for VOCs. Condition no. 10 required monthly calculation of the emissions from these tanks and condition no. 11 required reporting to the Division if monthly emissions exceeded 1/12 of the annual limit on emissions from these two tanks. However, since calculations show that the potential emissions from these two tanks is well below 40 tons per year, the avoidance conditions are not considered necessary and have not been carried over into the Title V permit.

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			

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	n/a			
TRS	n/a			
H ₂ S	n/a			
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		

3. MACT Standards

The major source thresholds for total and individual HAPs are 25 and 10 tons per year, respectively. Plantation Pipeline is a major source for total HAP emissions, which are tabulated to be 103 tons per year. Since Plantation Pipe Line is above the major source HAP threshold, the facility is subject to 40 CFR Part 63, Subpart R (National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)). Subpart R requires Plantation Pipe Line keep certain records to assure continued emission monitoring. The record keeping requirements may be found in the permit.

4. Program Applicability

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	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

This facility does not have any emission caps or limits. A limit had existing in the SIP permit for this facility, which limited emissions from tanks 176 and 177 to less than 40 tons per year, the PSD significance level. However, potential emissions from these two tanks are well below 40 tons per year, so this condition was not carried over into the Title V permit.

B. Applicable Rules and Regulations

Rules and Regulations Assessment

Plantation is not subject to any facility wide air quality rules other than the general provisions in Part VIII of the permit and the general provisions contained in Rule 391-3-1-.02(2)(a) and the general gasoline volatility Rule which applies to the entire metro Atlanta ozone non-attainment area.

Emission and Operating Standards

Because the facility is located in Haralson County and they store gasoline, the facility is subject to Georgia Rule for Air Quality Control 391-3-1-.02(2)(bbb), "Gasoline Marketing." 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).
- 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 non-attainment area.

Two comments were made in section 3.2 of the application regarding existing permit conditions, one requesting that condition no. 3 of the SIP permit be deleted as obsolete and a second requesting changes to the formula for calculating emissions from tanks 176 and 177. Condition 3 of the SIP permit required the dismantling of two tanks prior to the construction completion of tanks 176 and 177. This was accomplished many years ago, so this condition will not be included in the Title V permit. The condition regarding the calculation method for tank emissions from tanks 176 and 177 is also not included in the Title V permit. The calculations were to show that the emissions from these tanks were below 40 tons per year, the PSD significance level for VOC emissions. However, as previously mentioned, the potential emission level for these two

tanks is below that level, so the calculations are unnecessary and the condition is not being included in the new permit.

III. Regulated Equipment Requirements

A. Brief Process Description

Plantation Pipe Line operates a pipeline breakout station having a storage capacity of approximately 1.3 million barrels. The facility emission sources consist of 29 main regulated storage tanks (some of which store low volatility products and are included in the appendices of the permit as insignificant sources) and three contamination gasoline storage tanks. The terminal receives petroleum products by pipeline and also ships out product by pipeline to bulk gasoline terminals. Volatile organic compounds (VOCs) and Hazardous Air Pollutant (HAP) emissions result primarily from storage tank losses and from fugitive sources, such as flanges, valves and pump seals.

B. Equipment List for the Process

Unit I.D.	Source Description	Applicable Rule or regulation	Federally Enforceable ?
T034	External Floating Roof Tank	391-3-1-.02(2)(nn); 40CFR 63, Subpart R	Yes
T035	External Floating Roof Tank	391-3-1-.02(2)(nn); 40CFR 63, Subpart R	Yes
T036	External Floating Roof Tank	391-3-1-.02(2)(nn); 40CFR 63, Subpart R	Yes
T038	External Floating Roof Tank	391-3-1-.02(2)(nn); 40CFR 63, Subpart R	Yes
T039	External Floating Roof Tank	391-3-1-.02(2)(nn); 40CFR 63, Subpart R	Yes
T040	External Floating Roof Tank	391-3-1-.02(2)(nn); 40CFR 63, Subpart R	Yes
T041	External Floating Roof Tank	391-3-1-.02(2)(nn); 40CFR 63, Subpart R	Yes
T042	External Floating Roof Tank	391-3-1-.02(2)(nn); 40CFR 63, Subpart R	Yes
T043	External Floating Roof Tank	391-3-1-.02(2)(nn); 40CFR 63, Subpart R	Yes
T065	External Floating Roof Tank	391-3-1-.02(2)(nn); 40CFR 63, Subpart R	Yes
T066	External Floating Roof Tank	391-3-1-.02(2)(nn); 40CFR 63, Subpart R	Yes
T067	External Floating Roof Tank	391-3-1-.02(2)(nn); 40CFR 63, Subpart R	Yes
T068	External Floating Roof Tank	391-3-1-.02(2)(nn); 40CFR 63, Subpart R	Yes
T080	External Floating Roof Tank	391-3-1-.02(2)(nn); 40CFR 63, Subpart R	Yes
T081	External Floating Roof Tank	391-3-1-.02(2)(nn); 40CFR 63, Subpart R	Yes
T082	External Floating Roof Tank	391-3-1-.02(2)(nn); 40CFR 63, Subpart R	Yes
T127	Internal Floating Roof Tank	391-3-1-.02(2)(bb); 40CFR 63, Subpart R	Yes
TCT1	Internal Floating Roof Tank	391-3-1-.02(2)(bb); 40CFR 63, Subpart R	Yes
TCT2	Internal Floating Roof Tank	391-3-1-.02(2)(bb); 40CFR 63, Subpart R	Yes
TCT3	Internal Floating Roof Tank	391-3-1-.02(2)(bb); 40CFR 63, Subpart R	Yes
T176	Internal Floating Roof Tank	391-3-1-.02(2)(bb); 40CFR 60, Subpart Kb; 40CFR 63, Subpart R	Yes
T177	Internal Floating Roof Tank	391-3-1-.02(2)(bb); 40CFR 60, Subpart Kb; 40CFR 63, Subpart R	Yes
WAT1	Fixed Roof Tank	391-3-1-.02(2)(bb); 40CFR 60, Subpart K; 40CFR 63, Subpart R	Yes

C. Equipment & Rule Applicability

Emission and Operating Caps – Not Applicable

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

Georgia Rule (bb), “Petroleum Liquid Storage,” applies to tanks T127, TCT1, TCT2, TCT3, T176 and T177, since each of these tanks has a capacity of more than 40,000 gallons and is used to store a product with a vapor pressure of greater than 1.52 psia. These are fixed roof vessels, which are equipped with internal floating roofs. Tanks which have external floating roofs, are not subject to Rule (bb), since they do not have fixed roofs.

Georgia Rule (nn), “VOC Emissions from External Floating Roof Tanks,” applies to storage tanks with storage capacities of greater than 40,000 gallons that are equipped with external floating roofs. Tanks T034, T035, T036, T038, T039, T040, T041, T042, T043, T065, T066, T067, T068, T080, T081 and T082 meet these criteria and must therefore, have secondary seals on their roofs.

Georgia Rule (bbb), “Gasoline Marketing,” applies to facilities which produce, store, transport, supply, transfer or otherwise handle, sell or dispense gasoline. This Rule affects sources located in 25 counties in Georgia, including Haralson County where Plantation is located. This Rule has different requirements depending on whether the company is a producer, importer or carrier. Plantation meets the definition of a “carrier” as they transport the gasoline through their pipeline without taking title to or otherwise having any ownership of the gasoline.

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 WAT1 meets these criteria and has been equipped with a floating roof. Currently this tank is being used as a water accumulation tank.

40 CFR 60, Subpart Kb, is a federal standard of performance for petroleum storage vessels constructed after July 23, 1984 that have storage capacities of greater than 40 cubic meters (about 10,000 gallons). Tanks T176 and T177 meet these criteria. The gasoline the facility is storing does not meet the maximum vapor pressure values for exemption from this rule. Therefore, these tanks must have the following equipment:

- i. The internal floating roof must be resting on the stored liquid at all times except during the brief times when the tank is completely emptied.
- ii. The internal floating roof must have either a foam- or a liquid mounted liquid-filled seal, a double seal, or a mechanical shoe seal.

- iii. 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.
- iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to 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 bolted except when they are in use.
- v. Automatic bleeder vents shall be equipped with gaskets and are to 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.
- vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. These sample wells shall have slit fabric covers that cover at least 90 percent of their openings.
- viii. 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.
- ix. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

40 CFR 63, Subpart R, is a National Emission Standard for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations). Plantation emits over 25 tons per year of HAPs and as a pipeline breakout station is subject to this regulation. The regulation effects gasoline storage tanks and piping equipment but would not effect the fixed roof storage tanks at this facility when used for storing less volatile products such as diesel fuel or kerosene.

D. Compliance Status: See Section VII.F.

E. Operational Flexibility: See Section VII.A.

F. Permit Conditions

- 3.3.1 Requires tank WAT1 comply with Subpart K of 40 CFR 60, by having an internal floating roof.
- 3.3.2 Requires tanks T176 and T177 comply with 40 CFR 60, Subpart Kb, which is an existing permit condition. However, a limit on the emissions from these two tanks of 40 tons per year has not been carried over from the SIP permit, since the potential emissions from

those two tanks is below that level. The specific requirements of the regulation have been added into the permit. Due to Subpart R, tanks T127, TCT1, TCT2 and TCT3, which are also internal floating roof tanks, must also comply with some of the Kb requirements.

- 3.3.3 Requires all of the external floating roof tanks at this facility to have secondary seals with gaps that are less than certain specifications. These requirements are made by 40 CFR 63, Subpart R.
- 3.3.4 Contains additional requirements for external floating roof tanks not meeting the specifications listed in condition 3.3.3 by December 14, 1994, which is the publication date for 40 CFR 63, Subpart R in the federal register. This requirement and as with those in condition 3.3.3 were not previously listed in a SIP permit.
- 3.4.1 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.
- 3.4.2 Requires compliance with Rule (bb), although this is not a new requirement, it had not previously been listed in the SIP permit.
- 3.4.3 Requires compliance with Rule (nn). Although this facility has been subject to this Rule, the actual requirements are now being added into the permit. Rule (nn) gives a facility the option of complying through the use of secondary seals or an alternative control device. Although this facility currently uses secondary seals to comply, the option of an alternative method of compliance was left in the permit in case geodesic domes were installed in the future.

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. These are the standard testing conditions, which are included with all Title V permits. No specific testing requirements have been added to this permit. The control equipment at this facility consists primarily of seals on floating roof tanks. Proper condition of tank seals is verified by inspection, rather than by source testing.

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

The general requirements for monitoring have been included in the permit. 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. Many specific monitoring and record keeping requirements have also been added to the permit, all of which were taken from the Part 63 NESHAP, Subpart R regulations and/or Subpart Kb of the NSPS regulations. Subpart R

actually references Subpart Kb and requires gasoline storage tanks at affected facilities to meet some of these NSPS standards even though the storage vessels would not otherwise be subject to Subpart Kb.

Plantation must keep records of the products stored for all external and internal floating roof tanks. For internal floating roof tanks they are required to perform annual seal inspections through roof hatches and at least once every ten years they must inspect the seals when the tank has been emptied. For external floating roof tanks, gap seal measurements are required to be made every five years to assure that they are within the allowable tolerances. Measures to reduce fugitive emissions have been required by the permit, as well as monthly leak inspections for equipment in gasoline service. All of these requirements are taken directly from the federal regulations to which this facility is subject.

The Permittee must keep records of the monthly leak inspections and also the seal inspections for the floating roof tanks. All records must be retained for five years, and semi-annual reports must be submitted for any excursions that occur, with excursions being defined as leaks not repaired within five days of discovery.

VI. Other Record Keeping and Reporting Requirements

The Permit requires records 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. The permit also requires that records be kept of all equipment that is gasoline service, as per 40 CFR 63, Subpart R.

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

Plantation requested a change in the record keeping method for monthly VOC emissions from the two Subpart Kb tanks. However, this record keeping was to show compliance with a limit that was unnecessary and removed from the permit. The record keeping conditions were also not carried over into the Title V permit. There are no alternative requirements that need to be incorporated into this Title V Permit.

C. Insignificant Activities

Insignificant activities are listed in Attachment B of the permit and in sections 4.10 and 4.50 of the Title V permit application.

D. Temporary Sources

Plantation did not request the permitting of any temporary sources.

E. Short-Term Activities

Plantation 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. The original application (October 1996), however, indicated tank WAT1 needed to have an internal floating roof installed in order to comply with the then upcoming compliance date for 40 CFR 63, Subpart R. This roof was installed and section 11.10 was then deleted from the updated version (April 1999) of the application.

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

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

The public comment period ended on June 7, 2003. The only written comments received, were from Plantation Pipe Line. No comments were received from EPA.

The comments below have been copied from the letter submitted and have been put into italics. The Division's response to each comment follows. No changes have been made to the draft permit as the result of these comments.

Plantation's Comments:

1. *Permit Condition 2.3 – Facility Wide SIP Rule Standards, Permit Condition 5.2.11, and Permit Condition 5.3.3:*

Plantation's Bremen facility does "transport" gasoline, but only does so via pipeline to other downstream Plantation terminals. The downstream terminals that are subject to the Gasoline Marketing Rule comply with the provisions of 391-3-1-.02(2)(bbb). At the Bremen facility, however, no gasoline is removed from the facility for supply to an "ultimate consumer." Furthermore, Plantation does not envision this circumstance ever changing. Since the provisions of (bbb) are not applicable to the Bremen facility, Plantation proposes the removal of this condition in its entirety, along with the record keeping and reporting conditions of 5.2.11 and 5.3.3 from the Bremen Title V Permit. Plantation believes this may prevent future confusion.

RESPONSE

Although the description of their facility is accurate, the Division disagrees with Plantation's determination regarding the applicability of Rule 391-3-1-.02(2)(bbb). Rule (bbb) has provisions which apply to "producers," "importers," and "carriers." A "carrier" is defined by this rule as "... any distributor who transports or causes the transportation or storage of gasoline without taking title to or otherwise having any ownership of the gasoline, and without altering either the quality or quantity of the gasoline." Plantation meets these criteria and is therefore, a "carrier." Although Plantation does not supply gasoline to ultimate consumers directly from this facility, gasoline, which goes through the pipeline in Bremen, can reach consumers in the 45 counties covered by Rule (bbb). Condition 5.2.11 contains the record keeping requirements for carriers, taken directly from Rule (bbb), except that the records must be kept for five years, instead of two, as per Part 70 regulations. Plantation must keep records only of batches of gasoline, which they transport to a terminal (distributor), which will then in turn be distributed in any of the 45 affected counties. If none of the gasoline going through their pipeline is ultimately dispensed within this 45 county area, then no records need be kept. Condition 5.3.3 requires a summary of the records from condition 5.2.11 be submitted annually and is also taken directly from Rule (bbb). Finally, condition 2.3.1 contains all of the "general requirements" of Rule (bbb), including a list of the affected counties and the specifications for gasoline being delivered to these counties. The Division has previously agreed with EPA Region IV to include the general provisions of this rule in the permit for any subject facility, rather than just referencing the rule in the permit.

2. *Permit Condition 7.10.1*

Plantation would like to reiterate that the requirements of 40 CFR 68 do not apply to the Bremen “stationary source.” Transportation and storage incident to transportation are exempt (see 63 FR 640, January 6, 1998; “...transportation includes, but is not limited to, transportation in pipelines subject to oversight or regulation under 49 CFR Parts 192, 193, or 195...”). Thus, unless otherwise subject, a Risk Management Plan (RMP) is not required for the Bremen facility.

RESPONSE

The applicability of 112(r) is triggered by a facility storing certain specific chemicals or flammable materials in amounts above their corresponding threshold quantities. Different sections of 112(r) apply, depending on the chemical or substance being stored. A facility may increase or decrease the amount of a material stored, or start or cease storing a particular material, all without triggering any air quality permitting activity. The applicability of 112(r) to a facility may change several times during the lifetime of their Title V permit, therefore, this permit condition is included in all of Georgia’s Title V permits, whether applicable to the facility at the time of permit issuance or not.