

# OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation #26:

Permit #: 590-AOP-R1

IS ISSUED TO:

Arkansas Terminaling and Trading  
2207 Central Airport Road  
North Little Rock, AR 72117  
Pulaski County  
CSN: 60-0440

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

August 17, 1999      and      August 16, 2004

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

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Keith A. Michaels

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Date Modified

**SECTION I: FACILITY INFORMATION**

**PERMITTEE:** Arkansas Terminaling and Trading  
**CSN:** 60-0440  
**PERMIT NUMBER:** 590-AOP-R1

**FACILITY ADDRESS:** 2207 Central Airport Road  
North Little Rock, AR 72117

**COUNTY:** Pulaski

**CONTACT POSITION:** Rick Shingleur  
**TELEPHONE NUMBER:** (903) 794-3835

**REVIEWING ENGINEER:** Nancy Spencer Rogers

**UTM North-South (X):** 3847.9  
**UTM East-West (Y):** 575.2

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## **SECTION II: INTRODUCTION**

Arkansas Terminaling and Trading operates a bulk fuel storage terminal at 2207 Central Airport Road, North Little Rock, Pulaski County, Arkansas 72117. This permit is the first modification to Permit #590-AOP-R0. It has been issued as Permit #590-AOP-R1 as a part of the appeal resolution between the Department and the facility. In this resolution, the facility has determined a bottleneck of 170.5 mgal/hr for the loading rack based on three loading lanes. It was determined that the facility had not triggered the requirements of 40 CFR Part 63, Subpart R-*National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)*; therefore, the compliance plan was removed from the permit. Additionally, the oil/water separator was reclassified as an insignificant source. HAP concentration tables and testing requirements have been added to the Plantwide Conditions to demonstrate compliance with the HAP emissions at the facility.

### ***Process Description***

Gasoline, diesel, and jet naphtha fuel are delivered to the facility via pipeline. Upon delivery to the terminal, each product is bottom fed into bulk liquid fuel storage tanks. The above ground storage tanks are used to store gasoline, diesel, and jet naphtha.

The petroleum products are pumped from the storage tanks to the loading racks through above ground piping. At the loading racks, the petroleum products are bottom filled into tank trucks. The off gases are routed to the flare for incineration.

The oil/water separator processes petroleum products that are spilled at the loading rack and rain water. Free phase hydrocarbons are removed and held in a fixed roof holding tank. The water is discharged outside the berm through an outfall.

### **Summary**

Permit #590-AOP-R1 has been issued as per the requirements of Regulation #26 (Title V) and the Clean Air Act. This facility is also subject to the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (SIP) Chapter 10, Regulations for the Control of Volatile Organic Compounds, 40 CFR 60, Subpart Ka-*Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984*, Subpart Kb-*Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*, and Subpart XX-*Standards of Performance for Bulk Gasoline Terminals*.

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The facility is not subject to 40 CFR Part 63, Subpart R-*National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)* because the facility is not a major source for HAPs, is not located in a contiguous area and is not under the control of a facility that is a major source for HAPs.

A summary of facility wide emissions is provided in the following table. Specific emission unit information is located as indicated by the cross reference pages.

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EMISSION SUMMARY					
SN	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
<b>Total Allowable Emissions</b>		<b>VOC</b>	<b>115.3</b>	<b>145.5</b>	—
		<b>CO</b>	<b>13.7</b>	<b>16.0</b>	
		<b>NO<sub>x</sub></b>	<b>2.6</b>	<b>3.0</b>	
		<b>Benzene</b>	<b>0.256</b>	<b>0.300</b>	
		<b>Toluene</b>	<b>0.870</b>	<b>1.008</b>	
		<b>Xylene</b>	<b>0.470</b>	<b>0.526</b>	
		<b>Ethyl Benzene</b>	<b>0.110</b>	<b>0.120</b>	
		<b>Hexane</b>	<b>0.702</b>	<b>0.836</b>	
		<b>2,2,4-Trimethylpentane</b>	<b>1.358</b>	<b>0.476</b>	
Total Emissions for SN's 01 and 04.		VOC	—	0.9	9
01	Tank #1	VOC	0.8	—	9
04	Tank #4	VOC	5.1	—	9
Total Annual Emissions for SN's 02, 03, 05, 13, and 14		VOC	—	23.9	10
		Benzene	—	0.050	
		Toluene	—	0.168	
		Xylene	—	0.086	
		Ethyl Benzene	—	0.020	
		Hexane	—	0.136	
		2,2,4-Trimethylpentane	—	0.076	
02	Tank #2	VOC	1.0	—	10
		Benzene	0.003	—	
		Toluene	0.008	—	
		Xylene	0.006	—	
		Ethyl Benzene	0.002	—	
		Hexane	0.008	—	
		2,2,4-Trimethylpentane	0.014	—	
03	Tank #3	VOC	1.0	—	10
		Benzene	0.003	—	
		Toluene	0.008	—	
		Xylene	0.006	—	
		Ethyl Benzene	0.002	—	
		Hexane	0.008	—	
		2,2,4-Trimethylpentane	0.014	—	
05	Tank #5	VOC	1.9	—	10
		Benzene	0.005	—	
		Toluene	0.016	—	
		Xylene	0.008	—	
		Ethyl Benzene	0.002	—	
		Hexane	0.012	—	
		2,2,4-Trimethylpentane	0.024	—	

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<b>EMISSION SUMMARY</b>					
<b>SN</b>	<b>Description</b>	<b>Pollutant</b>	<b>Emission Rates</b>		<b>Cross Reference Page</b>
			<b>lb/hr</b>	<b>tpy</b>	
13	Tank #6	VOC	1.1	—	10
		Benzene	0.003	—	
		Toluene	0.010	—	
		Xylene	0.006	—	
		Ethyl Benzene	0.002	—	
		Hexane	0.008	—	
		2,2,4-Trimethylpentane	0.014	—	
14	Tank #7	VOC	0.9	—	10
		Benzene	0.002	—	
		Toluene	0.008	—	
		Xylene	0.004	—	
		Ethyl Benzene	0.002	—	
		Hexane	0.006	—	
		2,2,4-Trimethylpentane	0.012	—	
06	Ethanol Tank #1	Removed From Service			
07	Ethanol Tank #2	Removed From Service			
08	Ethanol Tank #3	Removed From Service			
09	Ethanol Tank #4	Removed From Service			
10	Oil/Water Separator	Reclassified as an Insignificant Activity			
11	East and West Loading Racks and Flare	VOC	103.4	120.3	19
		CO	13.7	16.0	
		NO <sub>x</sub>	2.6	3.0	
		Benzene	0.24	0.25	
		Toluene	0.82	0.84	
		Xylene	0.44	0.44	
		Ethyl Benzene	0.10	0.10	
		Hexane	0.66	0.70	
		2,2,4-Trimethylpentane	1.28	0.40	
12	Air Stripper	Removed From Service			
---	Fugitive Emissions	VOC	0.1	0.4	26

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### **SECTION III: PERMIT HISTORY**

Permit #590-A was issued in 1980. It permitted the usage of three gasoline storage tanks, one diesel storage tank, and one truck loading rack.

Permit #590-AR-1 was issued in March 1985 to install a second truck loading rack and an 80,000 barrel gasoline storage tank.

Permit #590-AR-2 was issued in 1988 in order to document several sources installed in 1985 but not listed in the permit.

Permit #590-AR-3 was issued in March 1990 for the installation and operation of a 45,000 bbl internal floating roof tank for the storage of gasoline, a 45,000 bbl cone roof tank for the storage of diesel oil, four 12,000 gallon cone roof tanks for the storage of ethanol, and one alcohol loading rack .

Permit #590-AR-4 was issued in September 1992 to allow the facility to install and operate an air stripper. The air stripper was installed and began operation in January 1993 as part of a treatment system for tank bottom water which contains hydrocarbons.

Permit #590-AR-5 was issued in January 1994 to correct discrepancies between actual equipment located at the facility and equipment listed in previous permits.

Permit #590-AR-6 was issued in October 1994 to document the addition of two bulk fuel storage tanks, to adjust the allowable emission rates for facility fugitive equipment leaks, and to adjust the allowable throughput and material vapor pressure for three existing storage tanks.

Permit #590-AR-R0 was issued on August 17, 1999, as the first operating air permit for this facility under the requirements of Regulation #26 (Title V). Under this permit, the allowable fuel throughput at the facility was increased and HAP emissions were quantified.

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**SECTION IV: EMISSION UNIT INFORMATION**



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**SN's 01, 04:  
Tanks #1 and #4**

***Source Description***

Tank #1 (SN-01) is a 1,111,911 gallon internal floating roof tank with a liquid-mounted primary seal. It was installed in 1980.

Tank #4 (SN-04) is a 1,899,110 gallon fixed roof tank. It was installed in 1980.

Pursuant to 40 CFR 60, Subpart Ka-*Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984*, Tanks #1 and #4 are not affected sources because they contain diesel (#2 fuel oil) which is specifically excluded from the requirements of a petroleum liquid.

***Specific Conditions***

1. Pursuant to §19.501 of Regulation 19 et seq, and 40 CFR Part 52, Subpart E, these sources shall not exceed the emission rates set forth in the following table. Compliance with these emission limits shall be demonstrated by compliance with Specific Condition #3.

SN	Pollutant	lb/hr	tpy
01	VOC	0.8	---
04	VOC	5.1	---
Total		---	0.9

2. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, Tanks #1 and #4 shall be used only for the storage of diesel fuel (#2 fuel oil).
3. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the total throughput of diesel for Tanks #1 and #4 at the facility shall be limited to 90,000,000 gallons per consecutive twelve month period.
4. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, records for the annual diesel throughput rate shall be maintained on a twelve month rolling basis, updated monthly. Such records shall be maintained on-site and made available to the Department upon request.

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**SN's 02, 03, 05, 13, 14:  
Tanks #2, #3, #5, #6, and #7**

***Source Description***

Tank #2 (SN-02) is a 1,996,056 gallon internal floating roof tank with a liquid-mounted primary seal. It was installed in 1980.

Tank #3 (SN-03) is a 1,997,053 gallon internal floating roof tank with a liquid-mounted primary seal. It was installed in 1980.

Tank #5 (SN-05) is a 3,365,080 gallon internal floating roof tank with a mechanical shoe seal. It was installed in 1985.

Tank #6 (SN-13) is a 1,799,559 gallon internal floating roof tank with a primary and secondary seal. It was installed in 1994.

Tank #7 (SN-14) is a 402,381 gallon internal floating roof tank with a primary and secondary seal. It was installed in 1994.

Pursuant to 40 CFR 60, Subpart Ka-*Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984*, Tanks #2 and #3 are affected sources. Pursuant to 40 CFR 60, Subpart Kb-*Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*, Tank #5, Tank #6, and #7 are affected sources. Applicable requirements are outlined in the following Specific Conditions.

***Specific Conditions***

5. Pursuant to §19.501 of Regulation 19 et seq, and 40 CFR Part 52, Subpart E, these sources shall not exceed the emission rates set forth in the following table. Compliance with these emission limits shall be demonstrated by compliance with Specific Conditions #7 and #8.

SN	Pollutant	lb/hr	tpy
02	VOC	1.0	---
03	VOC	1.0	---
05	VOC	1.9	---

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SN	Pollutant	lb/hr	tpy
13	VOC	1.1	---
14	VOC	0.9	---
Total		---	23.9

6. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, these sources shall not exceed the emission rates set forth in the following table. Compliance with these emission limits shall be demonstrated by compliance with Specific Conditions #7 and #8 and Plantwide Conditions #6 and #7.

SN	Pollutant	lb/hr	tpy
02	Benzene	0.003	---
	Toluene	0.008	---
	Xylene	0.006	---
	Ethyl Benzene	0.002	---
	Hexane	0.008	---
	2,2,4-Trimethylpentane	0.014	---
03	Benzene	0.003	---
	Toluene	0.008	---
	Xylene	0.006	---
	Ethyl Benzene	0.002	---
	Hexane	0.008	---
	2,2,4-Trimethylpentane	0.014	---
05	Benzene	0.005	---
	Toluene	0.016	---
	Xylene	0.008	---
	Ethyl Benzene	0.002	---
	Hexane	0.012	---
	2,2,4-Trimethylpentane	0.024	---
13	Benzene	0.003	---
	Toluene	0.010	---
	Xylene	0.006	---
	Ethyl Benzene	0.002	---
	Hexane	0.008	---
	2,2,4-Trimethylpentane	0.014	---

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SN	Pollutant	lb/hr	tpy
14	Benzene	0.002	---
	Toluene	0.008	---
	Xylene	0.004	---
	Ethyl Benzene	0.002	---
	Hexane	0.006	---
	2,2,4-Trimethylpentane	0.012	---
Total	Benzene	---	0.050
	Toluene	---	0.168
	Xylene	---	0.068
	Ethyl Benzene	---	0.020
	Hexane	---	0.136
	2,2,4-Trimethylpentane	---	0.076

7. Pursuant to §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, Tank's #2, #3, #5, #6, and #7 shall be used only for the storage of RVP 13 gasoline or lower vapor pressure products.
8. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the combined throughput of RVP 13 gasoline or lower vapor pressure products for Tanks #2, #3, #5, #6, and #7 shall be limited to 410,000,000 gallons per consecutive twelve month period.
9. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, records for the annual throughput of gasoline or lower vapor pressure product shall be maintained on a twelve month rolling basis, updated monthly. Such records shall be maintained on-site and submitted in accordance with General Provision #7.
10. Pursuant to §19.1004 (H)(1) of Regulation #19, the facility is subject to the malfunctions, breakdowns, and upset conditions which are in excess of the Regulations for the Control of Volatile Organic Compounds in Pulaski County of Regulation #19, Chapter 10. Emissions in excess of these Regulations which are temporary and result solely from a sudden and unavoidable breakdown, malfunction or upset of process or emission control equipment, or sudden and unavoidable upset of operation will not be considered a violation of these Regulations provided:

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- (1) the owner or operator notifies the Department of any such occurrence by the end of the next business day of the occurrence; and
  - (2) the owner or operator demonstrates to the Director that the suggested period of time for correction is as expeditious as practicable; and
  - (3) the breakdown or upset is determined by the Director to be unavoidable and not the result of negligence; and
  - (4) within five (5) days after the beginning of the occurrence, a written report is submitted to the Director which includes the cause and nature of the event, estimated quantity of volatile organic compounds emitted, time of emission and to prevent recurrence; and
  - (5) the Director is immediately notified when corrective measures have been accomplished.
11. Pursuant to §19.1005 (A)(1) of Regulation #19, the gasoline delivery vessels at the facility shall be loaded through bottom loading.
  12. Pursuant to §19.1005 (B)(1), the petroleum liquid storage tanks at the facility used for the storage of volatile organic compounds having a capacity greater than or equal to 150,000 liters have been equipped to meet the equipment requirements of §19.1005 (B)(1)(c).
  13. Pursuant to §19.1005 (B)(2), all seals necessary to meet the conditions of §19.1005 (B)(1)(b) and (c) shall be maintained in good operating condition.
  14. Pursuant to §19.1005 (B)(3), all openings, except stub drains and those related to safety, are to be sealed with suitable closures when not in use.
  15. Pursuant to §19.304 of Regulation 19, and 40 CFR 60, Subpart Ka-*Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984*, Tanks #2 and #3 are affected sources. (See Attachment A.) Applicable provisions include, but are not limited to the following.
    - A. Pursuant to §60.112a(a)(2), Tanks #2 and #3 are equipped with an internal floating roof. In accordance with this section, the tank cover is to be floating at all times except during initial fill and when the tank is completely emptied and subsequently refilled. The process of emptying and refilling when the cover is

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resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible. Each opening in the cover except for automatic bleeder vents and the rim space vents is to provide a projection below the liquid surface. Each opening in the cover except for automatic bleeder vents, rim space vents, stub drains and leg sleeves is to be equipped with a cover, seal, or lid which is to be maintained in a closed position at all times except when the device is in actual use. Automatic bleeder vents are to be closed at all times when the cover is floating except when the cover is being floated off or is being landed on the leg supports. Rim vents are to be set to open when the cover is being floated off the leg supports or at the manufacturer's recommended setting.

- B. Pursuant to §60.115a (a), the facility shall maintain a record of the petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period. In accordance with §60.115a (b), available data on the typical Reid vapor pressure and the maximum expected storage temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517, unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).
16. Pursuant to §19.304 of Regulation 19, and 40 CFR 60, Subpart Kb-*Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*, Tanks #5, #6, and #7 are affected sources. (See Attachment B.) Applicable provisions include, but are not limited to the following.
- A. Pursuant to §60.112b (a)(1), Tanks #5, #6 and #7 shall be equipped with an internal floating roof and a fixed outer roof.
  - B. Pursuant to §60.112b (a)(1)(i), the internal floating roof shall rest or float on the liquid surface at all times except during initial fill and during those intervals when the tank is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
  - C. Pursuant to §60.112b (a)(1)(ii)(B), Tanks #6 and #7 must have two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the

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internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.

- D. Pursuant to §60.112b (a)(1)(ii)(C), Tank #5 must have a mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- E. Pursuant to §60.112b (a)(1)(iii), each opening in a noncontact internal floating roof except for automatic bleeder vents and the rim space vents is to provide a projection below the liquid surface.
- F. Pursuant to §60.112b (a)(1)(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 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.
- G. Pursuant to §60.112b (a)(1)(v), automatic bleeder vents shall be equipped with a gasket 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 leg roof supports.
- H. Pursuant to §60.112b (a)(1)(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.
- I. Pursuant to §60.112b (a)(1)(vii), each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
- J. Pursuant to §60.112b (a)(1)(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.
- K. Pursuant to §60.112b (a)(1)(ix), each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

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- L. Pursuant to §60.113b (a)(1), the facility shall visibly inspect the internal floating roof and the primary seal prior to filling the tank with VOL. If there are holes, tears, or other openings in the primary seal or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the tank.
- M. Pursuant to §60.113b (a)(2), for Tank #5, the facility shall visibly inspect the internal floating roof and the primary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the tank, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the fabric seal, the facility shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
- N. Pursuant to §60.113b (a)(3), for Tanks #6 and #7, the facility shall (i) visually inspect the vessel as specified in paragraph (a)(4) of this section at least every 5 years; or (ii) visually inspect the vessel as specified in paragraph (a)(2) of this section.
- O. Pursuant to §60.113b (a)(4), the facility shall visibly inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and any sleeve seals each time the tank is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs (a)(2) and (a)(3)(ii) of this section and at intervals no greater than 5 years in the case of vessels specified in paragraph (a)(3)(i) of this section.



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- P. Pursuant to §60.113b (a)(5), the facility shall notify the Administrator in writing at least 30 days prior to the filling or refilling of the tank in order to afford the Administrator the opportunity to have an observer present. If the inspection is not planned and the facility could not have known about the inspection 30 days in advance of refilling the tank, the facility shall notify the Administrator at least 7 days prior to the refilling of the tank. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator at least 7 days prior to the refilling.
- Q. Pursuant to §60.115b, the facility shall keep records and furnish reports as required by this section for at least 2 years.
- R. Pursuant to §60.115b (a)(2), the facility shall keep a record of each inspection performed as required by §60.113b (a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the tank on which the inspection was performed and shall contain the date the tank was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
- S. Pursuant to §60.115b (a)(3), if any of the conditions described in §60.113b (a)(2) are detected during the annual visual inspection required by §60.113b(a)(2), a report shall be furnished to the Administrator within 30 days of the inspection. Each report shall identify the tank, the nature of the defects, and the date the storage vessel was emptied or the nature of and the date the repair was made.
- T. Pursuant to §60.115b (a)(3), after each inspection required by §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §60.113b(a)(3)(ii), a report shall be furnished to the Administrator within 30 days of the inspection. The report shall identify the storage vessel and the reasons it did not meet the specifications of §60.112b(a)(1) or §60.113b(a)(3) and list each repair made.
- U. Pursuant to §60.116b (a), the facility shall keep copies of all records required by this section for at least two years. The records required by §60.116b (b) shall be kept for the life of the tank.
- V. Pursuant to §60.116b (b), the facility shall keep readily accessible records showing the dimension and an analysis showing the capacity of the tank.

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- W. Pursuant to §60.116b (c), the facility shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. The maximum true vapor pressure is to be determined using one of the options detailed in §60.116b (e).

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**SN-11:**  
**East and West Loading Rack**

*Source Description*

At the loading racks, products are transferred from the storage tanks to tank trucks. Vapors from filling are incinerated by a flare. The loading racks were installed in 1985. They were modified in 1999. The number of fueling lanes will be reduced from four to three and the number of loading arms will be increased from 14 to 18. This unit processes 170.5 mgal/hr of gasoline or lower vapor pressure product.

The previous flare was replaced by a more efficient flare in 1997.

Pursuant to §19.304 of Regulation 19, and 40 CFR 60, Subpart XX-*Standards of Performance for Bulk Gasoline Terminals*, the loading racks are an affected source. Applicable requirements are outlined in the following Specific Conditions.

*Specific Conditions*

17. Pursuant to §19.501 of Regulation 19 et seq, and 40 CFR Part 52, Subpart E, this source shall not exceed the emission rates set forth in the following table. Compliance with these emission limits shall be demonstrated by compliance with Specific Conditions #3, #8, #22, and #25.

SN	Pollutant	lb/hr	tpy
11	VOC	103.4	120.3
	CO	13.7	16.0
	NO <sub>x</sub>	2.6	3.0

18. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this source shall not exceed the emission rates set forth in the following table. Compliance with these emission limits shall be demonstrated by compliance with Specific Conditions #3, #8, #22, and #25 and Plantwide Conditions #6 and #7.

SN	Pollutant	lb/hr	tpy
11	Benzene	0.24	0.25
	Toluene	0.82	0.84
	Xylene	0.44	0.44
	Ethyl Benzene	0.10	0.10

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SN	Pollutant	lb/hr	tpy
	Hexane	0.66	0.70
	2,2,4-Trimethylpentane	1.28	0.40

19. Pursuant to §19.304 of Regulation 19, and 40 CFR 60, Subpart XX-*Standards of Performance for Bulk Gasoline Terminals*, §60.502(b), the emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed the emission rates set forth in the following table. Compliance with this emission limit shall be demonstrated by compliance with Specific Condition #20.

SN	Pollutant	mg TOC/liter gasoline loaded
11	*TOC	35

\*TOC = Total Organic Compound

20. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, within 60 days of the issuance of this permit, unless such testing is completed after January 4, 2000, but prior to the issuance of this permit, the emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks shall be tested in accordance with the test methods and procedures of 40 CFR 60, §60.503. Within 30 days after testing, a copy of the testing information should be sent to the address below.

Arkansas Department of Environmental Quality  
Air Division  
ATTN: Air Enforcement  
Post Office Box 8913  
Little Rock, AR 72219

21. Pursuant to §19.1005(A)(3) of Regulation #19, the vapor control systems at the facility shall be properly maintained and used to prevent gasoline vapors from being emitted into in excess of the rate listed in the table below. Compliance with this emission limit shall be demonstrated by compliance with Specific Condition #19.

SN	Pollutant	mg VOC/liter gasoline loaded
11	VOC	80

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22. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the maximum simultaneous pumping rate of the loading racks is 170.5 mgal/hr of RVP 13 gasoline or lower pressure product. This bottleneck shall be demonstrated by limiting the facility to three fueling lanes. Any changes in the number of fueling lanes shall require a modification of this permit.
23. Pursuant to §19.1005 (D)(1) of Regulation #19, the facility shall not allow a gasoline tank truck to be emptied or filled unless the gasoline truck:
  - A. Is tested on an annual schedule according to the test procedure referenced in §19.1004 (F)(3).
  - B. Sustains a pressure change of no more than 750 Pascals (3 in. of H<sub>2</sub>O) in five minutes when pressurized to a gauge pressure of 4,500 Pascals (18 in. of H<sub>2</sub>O) or evacuated to a gauge pressure of 1,500 Pascals (6 in. of H<sub>2</sub>O) during the testing.
  - C. Is repaired by the owner or operator and retested within 15 days of testing if it does not meet the described criteria.
24. Pursuant to §19.1005 (D)(2)(a) of Regulation #19, the facility shall operate the vapor collection system and gasoline loading equipment in a manner that prevents:
  - A. Gauge pressure from exceeding 4,500 Pascals (18 in. of H<sub>2</sub>O) and vacuum from exceeding 1,500 Pascals (6 in. of H<sub>2</sub>O) in the gasoline tank truck.
  - B. A reading equal to or greater than 100 percent of the lower explosive limit (LEL, measured as propane) at 2.5 centimeters from all points on the perimeter of a potential leak source when measured by the method referenced in §19.1004 (F)(3) during loading or unloading operations.
  - C. Avoidable visible liquid leaks during loading or unloading operations.
25. Pursuant to §19.304 of Regulation 19, and 40 CFR 60, Subpart XX-*Standards of Performance for Bulk Gasoline Terminals*, the loading racks are an affected source. (See Attachment C.) Applicable provisions include, but are not limited to the following.
  - A. Pursuant to §60.502(a), the racks are equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading.

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- B. Pursuant to §60.502(d), the vapor collection system is designed to prevent total organic compound vapors collected at one loading rack from passing to another loading rack.
- C. Pursuant to §60.502(e), the loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures.
  - 1. The facility shall obtain the vapor tightness documentation described in §60.505(b) for each gasoline tank truck which is to be loaded at the facility.
  - 2. The facility shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the facility.
  - 3. The facility shall cross-check each tank identification number obtained in item 2 with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded.
  - 4. The facility shall notify the owner or operator of each nonvapor-tight gasoline tank truck loaded at the facility within 3 weeks after the loading has occurred.
  - 5. The facility shall take steps assuring that the non-vapor tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained.
- D. Pursuant to §60.502(f), the facility shall act to insure that loadings of gasoline tank trucks at the facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.
- E. Pursuant to §60.502(g), the facility shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the facility (i.e., training drivers in hookup procedures and posting visible reminder signs at the affected loading racks).
- F. Pursuant to §60.502(h), the vapor collection and liquid loading equipment shall be operated to prevent gauge pressure in the delivery tank from exceeding 4,500 Pascals (450 mm of H<sub>2</sub>O) during product loading. This level is not to be exceeded when measured by the procedures specified in §60.503(d).
- G. Pursuant to §60.502(i), no pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 Pascals (450 mm of H<sub>2</sub>O).

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- H. Pursuant to §60.502(j), each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For this inspection, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.
- I. Pursuant to §60.503(b), immediately before the performance test required to determine compliance with §60.502 (b) and (h), the facility shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The owner shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.
- J. Pursuant to §60.503 (c), the facility shall determine compliance with the standards of §60.502 (b) as outlined in §60.503(c)(1), (2), (3), (4), (5), (6), and (7).
- K. Pursuant to §60.503 (d), the facility shall determine compliance with the standards of §60.502 (h) as outlined in §60.503 (d)(1) and (2).
- L. Pursuant to §60.505 (a), the tank truck vapor tightness documentation required under §60.502(e)(1) shall be kept on file at the terminal in a permanent form available for inspection.
- M. Pursuant to §60.505 (b), the documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include the following information:
  - 1. Test title: Gasoline Delivery Tank Pressure Test - EPA Reference Method 27.
  - 2. Tank owner and address.
  - 3. Tank identification number.
  - 4. Testing location.
  - 5. Date of test.
  - 6. Tester name and signature.
  - 7. Witnessing inspector, if any: name, signature, and affiliation.
  - 8. Test results: actual pressure change in 5 minutes, mm of H<sub>2</sub>O (average for 2 runs)

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- N. Pursuant to §60.505 (c), a record of each monthly leak inspection required under §60.502(j) shall be kept on file at the terminal for at least 2 years. Inspection records shall include the following information:
  - 1. Date of inspection.
  - 2. Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).
  - 3. Leak determination method.
  - 4. Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).
  - 5. Inspector name and signature.
  
- O. Pursuant to §60.505 (d), the facility shall keep documentation of all notifications required under §60.502(e)(4) on file at the terminal for at least 2 years.



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**SN-12  
Air Stripper**

***Source Description***

The Air Stripper has a design rate of 100 gallons per minute. It removes dissolved hydrocarbons from wastewater. It was installed in 1992 and removed from service in 1999. This source cannot be brought back into service unless the permit is modified. If brought back into service, this source will not be considered an insignificant activity unless the actual capacity of the air stripper is demonstrated.

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**Fugitive Emissions**

The following is the summary of the fugitive emission sources at the facility. They are based on the number of valves, loading arm valves, open-ended lines, flanges, and pump seals at the facility.

***Specific Conditions***

26. Pursuant to §19.501 of Regulation 19 et seq, and 40 CFR Part 52, Subpart E, the fugitive emissions at this facility shall not exceed the emission rates set forth in the following table. Compliance with these emission limits shall be demonstrated by compliance with Specific Condition #27.

SN	Pollutant	lb/hr	tpy
---	VOC	0.1	0.4

27. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the facility shall perform an annual facility count of valves, loading arm valves, open-ended lines, flanges, and pump seals in order to modify the permit if necessary for any significant changes in emissions due to changes in piping at the facility. At the issuance of this permit, the submitted count was - 321 valves, 693 flanges, and 29 pump seals.
28. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, records of the annual facility count of valves, flanges, and pump seals shall be maintained on an annual basis. Such records shall be maintained on-site and submitted in accordance with General Provision #7.

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## **SECTION V: COMPLIANCE PLAN AND SCHEDULE**

Arkansas Terminaling and Trading is in compliance with the applicable regulations cited in the permit application. Arkansas Terminaling and Trading will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

**SECTION VI: PLANTWIDE CONDITIONS**

1. Pursuant to Section 19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
2. Pursuant to Section 19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance if the work involved in the construction or modification is suspended for a total of 18 months or more.
3. Pursuant to Section 19.702(E), 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, each emission point for which an emission test method is specified in this permit shall be tested in order to determine compliance with the emission limitations contained herein within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Two copies of the compliance test results shall be submitted to the Department within thirty (30) days after the completed testing. The permittee shall provide:
  - (1) Sampling ports adequate for applicable test methods
  - (2) Safe sampling platforms
  - (3) Safe access to sampling platforms
  - (4) Utilities for sampling and testing equipment
4. Pursuant to Section 19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.
5. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.
6. Pursuant to §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the facility shall comply with the following concentration limits for each type of gasoline. Compliance shall be demonstrated by Plantwide Condition #8.

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<b>HAP Tested</b>	<b>Allowed Concentration (mg/kg)</b>
Ethyl benzene	26,200
Toluene	80,600
Total Xylenes	139,800
Hexane	12,400
2,2,4-Trimethylpentane	72,600

Any concentrations above the allowed limits shall require a modification to this permit.

7. Pursuant to §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the facility shall maintain the following hourly gasoline throughputs on a daily basis average (24 hour period) as based on the benzene concentration tested in Plantwide Condition #8.

<b>Allowable Benzene Concentrations</b>	
<b>Allowable Hourly Gasoline Throughput (mgal/hr)</b>	<b>Benzene Concentration (mg/kg)</b>
170.5	7,000
160	7,500
150	8,000
140	8,575
130	9,225
120	10,000
110	10,900
100	12,000
90	13,325
80	15,000
70	17,150
60	20,000
50	24,000
40	30,000
30	40,000

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In order to demonstrate compliance with the conditions of this table, the facility shall test the liquid benzene concentrations as required by Plantwide Condition #8. The tested concentration shall be used to determine the maximum allowable gasoline throughput at the Loading Racks for each monitoring period. In order to demonstrate compliance with the conditions of this table for benzene concentrations >7000 mg/kg, the facility shall use the Bills of Lading to demonstrate that the daily gasoline throughput as averaged on a 24 hour basis does not exceed the maximum hourly gasoline throughput allowed by the table for each specific benzene concentration tested in Plantwide Condition #8. At tested concentrations of benzene # 7000 mg/kg, no recordkeeping requirements are needed.

Any exceedances of this condition shall require a modification to this permit.

8. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the facility shall use a method approved by the Department to test the gasoline to determine compliance with the concentration limits of Plantwide Conditions #6 and #7.

This testing shall be performed once per month for the first year (twelve month) period after which time the testing shall be performed quarterly. Each quarterly test must be performed at least 30 days after the previous quarterly test. Within 30 days after testing, a copy of the testing information shall be sent to the address below.

Arkansas Department of Environmental Quality  
Air Division  
Attn.: Air Enforcement  
Post Office Box 8913  
Little Rock, AR 72219

If, after two years (24 months), the facility has successfully demonstrated compliance with the concentration limits of Plantwide Conditions #6 and #7, it may petition the Department for less frequent monitoring requirements.

9. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, no tank bottoms shall be processed on-site except for storage prior to off-site disposal.
10. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the facility shall keep records of the dates and amounts of tank bottoms shipped from the facility.

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11. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, records of the tank bottoms shall be maintained on a twelve month rolling basis, updated monthly. Such records shall be maintained on-site and submitted in accordance with General Provision #7.

**Title VI Provisions**

12. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
  - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
  - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
13. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
  - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC-like appliance” as defined at §82.152.)

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- e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
14. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
15. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant ( or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.

16. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

**PERMIT SHIELD**

17. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in item A of this condition:
- A. The following have been specifically identified as applicable requirements based upon information submitted by the permittee.



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Source No.	Regulation	Description
Facility	Arkansas Regulation 19	Compilation of Regulations of the Arkansas State Implementation Plan for Air Pollution Control
Facility	Arkansas Regulation 26	Regulations of the Arkansas Operating Air Permit Program
02, 03	40 CFR 60, Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commences After May 18, 1978, and Prior to July 23, 1984
05, 13, 14	40 CFR 60, Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984
11	40 CFR 60, Subpart XX	Standards of Performance for Bulk Gasoline Terminals

B. The following requirements have been specifically identified as not applicable, based upon information submitted by the permittee.

Description of Regulation	Regulatory Citation	Affected Source	Basis for Determination
Standards of Performance for Storage Vessels for Petroleum Liquids Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978	40 CFR 60, Subpart K	01-05, 13, 14	All tanks were installed after 1978.
National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)	40 CFR 63, Subpart R	Facility	The facility is not a major source for HAPs, is not located in a contiguous area and is not under the control of a facility that is a major source for HAPs.

C. Nothing shall alter or affect the following:

Provisions of Section 303 of the Clean Air Act;

The liability of an owner or operator for any violation of applicable requirements prior to or at the time of permit issuance;

The applicable requirements of the acid rain program, consistent with section 408(a) of the Clean Air Act; or

The ability of the EPA to obtain information under Section 114 of the Clean Air Act.

**SECTION VII: INSIGNIFICANT ACTIVITIES**

Pursuant to §26.3(d) of Regulation 26, the following sources are insignificant activities. Insignificant and trivial activities will be allowable after approval and federal register notice publication of a final list as part of the operating air permit program. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §3(d) of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee.

The following sources will be considered sources of insignificant emissions because they are storage tanks less than 10,000 gallons storing organic liquids having a true vapor pressure less than 0.5 psia and the aggregate emissions from these organic liquid storage tanks do not exceed five tons per year and do not exceed any hazardous air pollutant de minimis rate established pursuant to section 112(g) of the Clean Air Act.

<b>Insignificant Tanks</b>	
<b>Description</b>	<b>Capacity (gallons)</b>
Red Dye (for diesel)	550
AT&T Additive	10,000
Phillips Additive	3,000
Phillips Jet A Additive	1,000
Texaco Additive	10,000
Shell Additive	10,000
Total Additive	6,000

The oil/water separator shall be considered insignificant because no enforceable permit conditions are necessary to insure compliance with any applicable law and that the emissions are less than 5 tpy of any pollutant regulated under this regulation or less than 1 tpy of a single HAP or 2.5 tpy of any combination of HAPs.

Pursuant to §26.3(d) of Regulation 26, the following emission units, operations, or activities have been determined by the Department to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

1. Combustion emissions from propulsion of mobile sources and emissions from refueling these sources unless regulated by Title II and required to obtain a permit under Title V of the federal Clean Air Act, as amended. This does not include emissions from any transportable units, such as temporary compressors or boilers. This does not include

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emissions from loading racks or fueling operations covered under any applicable federal requirements.

2. Air conditioning and heating units used for comfort that do not have applicable requirements under Title VI of the Act.
3. Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.
4. Non-commercial food preparation or food preparation at restaurants, cafeterias, or caterers, etc.
5. Consumer use of office equipment and products, not including commercial printers or business primarily involved in photographic reproduction.
6. Janitorial services and consumer use of janitorial products.
7. Internal combustion engines used for landscaping purposes.
8. Laundry activities, except for dry-cleaning and steam boilers.
9. Bathroom/toilet emissions.
10. Emergency (backup) electrical generators at residential locations.
11. Tobacco smoking rooms and areas.
12. Blacksmith forges.
13. Maintenance of grounds or buildings, including: lawn care, weed control, pest control, and water washing activities.
14. Repair, up-keep, maintenance, or construction activities not related to the sources' primary business activity, and not otherwise triggering a permit modification. This may include, but is not limited to such activities as general repairs, cleaning, painting, welding, woodworking, plumbing, re-tarring roofs, installing insulation, paved/paving

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- parking lots, miscellaneous solvent use, application of refractory, or insulation, brazing, soldering, the use of adhesives, grinding, and cutting.<sup>1</sup>
15. Surface-coating equipment during miscellaneous maintenance and construction activities. This activity specifically does not include any facility whose primary business activity is surface-coating or includes surface-coating or products.
  16. Portable electrical generators that can be “moved by hand” from one location to another.<sup>2</sup>
  17. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning, or machining wood, metal, or plastic.
  18. Brazing or soldering equipment related to manufacturing activities that do not result in emission of HAPs.<sup>3</sup>
  19. Air compressors and pneumatically operated equipment, including hand tools.
  20. Batteries and battery charging stations, except at battery manufacturing plants.
  21. Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOCs or HAPs.<sup>4</sup>
  22. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and no volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.

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<sup>1</sup> Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must get a permit.

<sup>2</sup> “Moved by hand” means that it can be moved by one person without assistance of any motorized or non-motorized vehicle, conveyance, or device.

<sup>3</sup> Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production thresholds. Brazing, soldering, and welding equipment, and cutting torches related directly to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately in this appendix.

<sup>4</sup> Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids are based on size and limits including storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.

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23. Equipment used to mix and package soaps, vegetable oil, grease, animal fat, and non-volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.
24. Drop hammers or presses for forging or metalworking.
25. Equipment used exclusively to slaughter animals, but not including other equipment at slaughter-houses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
26. Vents from continuous emissions monitors and other analyzers.
27. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
28. Hand-held applicator equipment for hot melt adhesives with no VOCs in the adhesive.
29. Lasers used only on metals and other materials which do not emit HAPs in the process.
30. Consumer use of paper trimmers/binders.
31. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
32. Salt baths using non-volatile salts that do not result in emissions of any air pollutant covered by this regulation.
33. Laser trimmers using dust collection to prevent fugitive emissions.
34. Bench-scale laboratory equipment used for physical or chemical analysis not including lab fume hoods or vents.
35. Routine calibration and maintenance of laboratory equipment or other analytical instruments.
36. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
37. Hydraulic and hydrostatic testing equipment.

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38. Environmental chambers not using hazardous air pollutant gases.
39. Shock chambers, humidity chambers, and solar simulators.
40. Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
41. Process water filtration systems and demineralizers.
42. Demineralized water tanks and demineralizer vents.
43. Boiler water treatment operations, not including cooling towers.
44. Emissions from storage or use of water treatment chemicals, except for hazardous air pollutants or pollutants listed under regulations promulgated pursuant to Section 112(r) of the Act, for use in cooling towers, drinking water systems, and boiler water/feed systems.
45. Oxygen scavenging (de-aeration) of water.
46. Ozone generators.
47. Fire suppression systems.
48. Emergency road flares.
49. Steam vents and safety relief valves.
50. Steam leaks.
51. Steam cleaning operations.
52. Steam and microwave sterilizers.
53. Site assessment work to characterize waste disposal or remediation sites.
54. Miscellaneous additions or upgrades of instrumentation.
55. Emissions from combustion controllers or combustion shutoff devices but not combustion units itself.

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56. Use of products for the purpose of maintaining motor vehicles operated by the facility, not including air cleaning units of such vehicles (i.e. antifreeze, fuel additives).
57. Stacks or vents to prevent escape of sanitary sewer gases through the plumbing traps.
58. Emissions from equipment lubricating systems (i.e. oil mist), not including storage tanks, unless otherwise exempt.
59. Residential wood heaters, cookstoves, or fireplaces.
60. Barbecue equipment or outdoor fireplaces used in connection with any residence or recreation.
61. Log wetting areas and log flumes.
62. Periodic use of pressurized air for cleanup.
63. Solid waste dumpsters.
64. Emissions of wet lime from lime mud tanks, lime mud washers, lime mud piles, lime mud filter and filtrate tanks, and lime mud slurry tanks.
65. Natural gas odoring activities unless the Department determines that emissions constitute air pollution.
66. Emissions from engine crankcase vents.
67. Storage tanks used for the temporary containment of materials resulting from an emergency reporting to an unanticipated release.
68. Equipment used exclusively to mill or grind coatings in roll grinding rebuilding, and molding compounds where all materials charged are in paste form.
69. Mixers, blenders, roll mills, or calendars for rubber or plastic for which no materials in powder form are added and in which no organic solvents, diluents, or thinners are used.
70. The storage, handling, and handling equipment for bark and wood residues not subject to fugitive dispersion offsite (this applies to the equipment only).

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71. Maintenance dredging of pulp and paper mill surface impoundments and ditches containing cellulosic and cellulosic derived biosolids and inorganic materials such as lime, ash, or sand.
72. Tall oil soap storage, skimming, and loading.
73. Water heaters used strictly for domestic (non-process) purposes.
74. Facility roads and parking areas, unless necessary to control offsite fugitive emissions.
75. Agricultural operations, including onsite grain storage, not including IC engines or grain elevators.
76. The following natural gas and oil exploration production site equipment: separators, dehydration units, natural gas fired compressors, and pumping units. This does not include compressors located on natural gas transmission pipelines.



**SECTION VIII: GENERAL PROVISIONS**

1. Pursuant to 40 CFR 70.6(b)(2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to 40 CFR 70.6(a)(2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.
3. Pursuant to §26.4 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.
4. Pursuant to 40 CFR 70.6(a)(1)(ii) and §26.7 of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.
5. Pursuant to 40 CFR 70.6(a)(3)(ii)(A) and §26.7 of Regulation #26, records of monitoring information required by this permit shall include the following:
  - a. The date, place as defined in this permit, and time of sampling or measurements;
  - b. The date(s) analyses were performed;
  - c. The company or entity that performed the analyses;
  - d. The analytical techniques or methods used;

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- e. The results of such analyses; and
  - f. The operating conditions existing at the time of sampling or measurement.
6. Pursuant to 40 CFR 70.6(a)(3)(ii)(B) and §26.7 of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
7. Pursuant to 40 CFR 70.6(a)(3)(iii)(A) and §26.7 of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

Arkansas Department of Environmental Quality  
Air Division  
ATTN: Air Enforcement  
Post Office Box 8913  
Little Rock, AR 72219

8. Pursuant to 40 CFR 70.6(a)(3)(iii)(B), §26.7 of Regulation #26, and Section 19.601 and 19.602 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
- a. The facility name and location,
  - b. The process unit or emission source which is deviating from the permit limit,
  - c. The permit limit, including the identification of pollutants, from which deviation occurs,
  - d. The date and time the deviation started,
  - e. The duration of the deviation,
  - f. The average emissions during the deviation,

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- g. The probable cause of such deviations,
- h. Any corrective actions or preventive measures taken or being take to prevent such deviations in the future, and
- i. The name of the person submitting the report.

A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include in addition to the information required by initial report a schedule of actions to be taken to eliminate future occurrences and/or to minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may submit a full report in writing (by facsimile, overnight courier, or other means) within 24 hours of discovery of the occurrence and such report will serve as both the initial report and full report.

- 9. Pursuant to 40 CFR 70.6(a)(5) and §26.7 of Regulation #26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.
- 10. Pursuant to 40 CFR 70.6(a)(6)(i) and §26.7 of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- 11. Pursuant to 40 CFR 70.6(a)(6)(ii) and §26.7 of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- 12. Pursuant to 40 CFR 70.6(a)(6)(iii) and §26.7 of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or

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termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

13. Pursuant to 40 CFR 70.6(a)(6)(iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
14. Pursuant to 40 CFR 70.6(a)(6)(v) and §26.7 of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.
15. Pursuant to 40 CFR 70.6(a)(7) and §26.7 of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 CFR 70.6(a)(8) and §26.7 of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.
17. Pursuant to 40 CFR 70.6(a)(9)(i) and §26.7 of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.
18. Pursuant to 40 CFR 70.6(b) and §26.7 of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.
19. Pursuant to 40 CFR 70.6(c)(1) and §26.7 of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.

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20. Pursuant to 40 CFR 70.6(c)(2) and §26.7 of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
  - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.
  
21. Pursuant to 40 CFR 70.6(c)(5) and §26.7 of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:
  - a. The identification of each term or condition of the permit that is the basis of the certification;
  - b. The compliance status;
  - c. Whether compliance was continuous or intermittent;
  - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
  - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and 504(b) of the Act.
  
22. Pursuant to §26.7 of Regulation #26, nothing in this permit shall alter or affect the following:
  - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
  - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;

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- c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
  - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.