ADEQ
OPERATING
AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation No. 26:

Permit No. : 590-AOP-R10

Renewal #1

IS ISSUED TO:

Arkansas Terminaling & Trading

2207 Central Airport Road

North Little Rock, AR 72117

Pulaski County

AFIN: 60-00440

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:

April 19, 2004 AND April 18, 2009

IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Mike Bates, Chief
Air Division

Date Modified

Table of Contents

Table 1 - List of Acronyms

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound per hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO_x	Nitrogen Oxide
PM	Particulate matter
PM_{10}	Particulate matter smaller than ten microns
SNAP	Significant New Alternatives Program (SNAP)
SO_2	Sulfur dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Ton per year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Section I: FACILITY INFORMATION

PERMITTEE:	Arkansas Terminaling & Trading
AFIN:	60-00440
PERMIT NUMBER:	590-AOP-R10
FACILITY ADDRESS:	2207 Central Airport Road
	North Little Rock, AR 72117
MAILING ADDRESS:	Truman Arnold Companies
	701 South Robinson Road
	Texarkana, Texas 75504
COUNTY:	Pulaski
CONTACT POSITION:	Rick Shingleur, Environmental Manager
TELEPHONE NUMBER:	(903) 794-3835
REVIEWING ENGINEER:	Derrick L. Brown
UTM North - South (Y):	Zone 15 [3848.0]
UTM East - West (X):	Zone 15 [575.2]

Section II: INTRODUCTION

Summary of Permit Activity

Arkansas Terminaling and Trading (AT&T), North Little Rock, Arkansas submitted an application for a Title V Minor Modification to Permit No. 590-AOP-R9. This modification will allow the installation of a 20,000 gallon vertical fixed roof tank to store biodiesel. This source will be named Tank #19 and shall be given source number SN-19. This action requests an increase of VOC emission of 0.1 tons per year.

AT&T is classified as a PSD Major Source because its petroleum storage capacity exceeds 300,000 bbls and the permitted VOC emissions exceed 100 tpy. This modification does not trigger a PSD review because there were no significant increases for any of the pollutants.

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. Biodiesel will be delivered by truck and will be loaded into an aboveground storage tank.

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 separators process 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.

Regulations

The following table contains the regulations applicable to this permit.

Table 2 - Regulations

Source No.	Regulation Citations
Facility	Regulation #18, *Arkansas Air Pollution Control Code*
Facility	Regulation #19, *Regulations of the Arkansas Plan of Implementation for Air Pollution Control, (Including Chapter 10)*
Facility	Regulation #26, *Regulation of the Arkansas Operating Air Permit Program*
Facility	40 CFR Part 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*
Facility	40 CFR Part 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*

Source No.	Regulation Citations
	July 23, 1984
Facility	40 CFR Part 60, Subpart XX-*Standards of Performance for Bulk Gasoline Terminals.*

The following table is a summary of emissions from the facility. The following table contains cross-references to the pages containing specific conditions and emissions for each source. This table, in itself, is not an enforceable condition of the permit.

Table 3 – Emission Summary

EMISSION SUMMARY					
Source No.	**Description**	**Pollutant**	**Emission Rates**		**Cross Reference Page**
			lb/hr	**tpy**	
Total Allowable Emissions		VOC	159.6	167.1	N/A
		CO	19.8	17.9	
		NO_X	3.7	3.3	
Total Allowable HAP Emissions*		Benzene	0.24	0.25	N/A
		Toluene	1.11	1.14	
		Ethyl Benzene	0.10	0.10	
		Xylene	0.57	0.59	
		Hexane	0.91	0.93	
		2,2,4 Trimethylpentane	1.37	1.43	
01	Tank #1 (Diesel Fuel Only)	VOC	1.0	1.4	11
04	Tank #4 (Diesel Fuel Only)	VOC	0.5		
02, 03, 05, 13, 14, 16, 17	Tanks #2, #3, #5, #6, #7, #8, #9	VOC	11.6	32.5	12
		Benzene	0.02	0.05	
		Toluene	0.08	0.21	
		Ethyl Benzene	0.01	0.02	
		Xylene	0.04	0.11	
		Hexane	0.07	0.17	
		2,2,4 Trimethylpentane	0.10	0.28	
11	Loading Racks (95% VOC routed to 98% efficient flare)	VOC	146.3	132.2	20
		CO	19.8	17.9	
		NO_X	3.7	3.3	
		Benzene	0.22	0.20	
		Toluene	1.03	0.93	
		Ethyl Benzene	0.09	0.08	
		Xylene	0.53	0.48	
		Hexane	0.84	0.76	
		2,2,4 Trimethylpentane	1.27	1.15	
18	Tank #18	VOC	1.6	0.07	27
19	Tank #19	VOC	1.6	0.05	27

EMISSION SUMMARY					
Source No.	**Description**	**Pollutant**	**Emission Rates**		**Cross Reference Page**
			lb/hr	**tpy**	
--	Fugitive Emissions	VOC	0.2	0.8	26

* All HAPs are included in the VOC totals.

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-AOP-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.

Permit #590-AOP-R1 was issued on March 16, 2000 as a part of the appeal resolution between the Department and the facility. In the 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.

Permit #590-AOP-R2 was issued on May 6, 2002 and allowed the facility to change the seal on Tank #6 from two seals mounted one above the other to a mechanical shoe seal, and to pre-approve changing Tank #7 to a mechanical shoe seal should its primary/secondary seals begin to deteriorate. Total increase in VOC emissions will be less than 0.1 tons per year.

According to Plantwide Condition #9, the facility, upon demonstration that it is in compliance with Plantwide Conditions #7 and #8, may petition the Department for less frequent gasoline sampling requirements. The facility has demonstrated full compliance with these conditions. As of Permit #590-AOP-R2, the facility shall only be required to sample the gasoline once every twelve months.

Permit #590-AOP-R3 was issued on December 6, 2002 and allowed the facility to increase diesel throughput to 175,000,000 gallons per year. Tank #1 (SN-01), Tank #4 (SN-04), and the East and West Loading Racks with a flare (SN-11) will be affected by the new throughput limit. Total increase in emissions will be 0.2 tons per year of VOC and 0.3 tons per year of NOX.

Permit #590-AOP-R4 was issued on June 26, 2003. The modification allowed the facility to construct two 80,000 barrel (3,360,000 gallon) tanks to store gasoline or lower vapor pressure products, add an additional fueling lane with six additional loading arms, increase hourly loading rack throughput to 210 mgal/hr, update the maximum allowable liquid concentration of benzene based on 210 mgal/hr for the maximum flow rate at the loading rack Plantwide Condition #7, increase VOC and HAP fugitive emissions due to the increase in the number of valves, flanges and pump seals from the installation of the new equipment, and update hourly and annual facility-wide VOC and HAP emission rates due to decreasing the permitted concentration of benzene in the fuel by 20%, or to 5,600 mg Benzene/kg of fuel.

With the issuance of #590-AOP-R4 AT&T's petroleum fuel storage capacity exceeded 300,000 bbl. Since the facility is also over 100 tpy for VOC it is now one of the 28 listed sources and is classified as a PSD major source for VOC.

Permit #590-AOP-R5 was issued April 19, 2004. The permit was the first Title V Renewal issued to AT&T. The renewal included modifications to allow the facility to increase annual throughput of jet fuel by 75,000,000 gal, increase VOC and HAP fugitive emissions due to the increase in the number of valves, flanges, and pump seals from the installation of new equipment, install a second oil/water separator (insignificant activity), and make a change in the types of fuel stored in SN-13, SN-14, and SN-16. The emissions associated with the modifications are less than 0.01 lb/hr and 1.05 tpy of VOC. Annual diesel and gasoline throughputs will not change at the loading rack. Tank #6 (SN-13) and Tank #7 (SN-14) are now used to store jet fuel. Tank #8 (SN-16) is now used to store diesel fuel. The changes in service for these tanks were made in accordance with Plantwide Condition #19. When Permit #590-AOP-R4 was issued, AT&T was approved to install a new loading lane and additional loading arms at the existing loading rack. After the permit was issued, AT&T discovered some of the underground piping could be damaged by traffic on the proposed loading lane. The proposed loading lane and arms were installed at a separate location at the facility, adjacent to Tank #8 and Tank #9.

Permit #590-AOP-R6 was issued on August 2, 2005. The modification allowed the facility to increase the annual gasoline throughput from 410,000,000 gallons to 450,000,000 gallons; route gasoline through the recently installed loading lanes; increase the hourly loading rate from 210,000 gal/hr to 215,000 gal/hr; increase the number of pump seals from 50 to 90; and reduce the maximum allowable benzene concentration in the gasoline from 5,600 mg/kg to 5,000 mg/kg.

The emissions increase associated with the modifications for VOC, CO, NO_X, and HAPs were 12.1 tpy, 1.6 tpy, 0.3 tpy, and 0.30 tpy, respectively. AT&T's is classified as a PSD Major Source because its petroleum storage capacity exceeds 300,000 bbls, and its VOC emissions exceed 100 tpy. PSD review was not triggered because there was no significant increase for any pollutant.

Permit #590-AOP-R7 was issued on January 26, 2006. This modification allowed the replacement of the existing Tank #2 seal system with a mechanical shoe seal as allowed under 40 CFR Part 60 (NSPS) Subpart Ka. The replacement resulted in a permitted emission increase of 2.8 tons per year of VOC.

Permit #590-AOP-R8 was issued on August 16, 2006. This modification increased diesel throughput and granted the installation of a 20,000 gallon vertical fixed roof tank.

Permit #590-AOP-R9 was issued on January 10, 2007. This modification allowed an increase in annual bio-diesel throughput from 120,000 gallons to 980,000 gallons. This permit action grants a VOC increase to Tank #18. Therefore, this permit action grants a net VOC increase to Tank #18. Therefore, this permit action grants a net VOC increase of 0.1 tons of VOC per year.

Section IV: SPECIFIC CONDITIONS

SN-01 and SN-04

Tank #1 and Tank #4

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. The permit allows the following maximum emission rates. The permittee shall demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 et seq. effective May 28, 2006, and 40 CFR Part 52, Subpart E]

Table 4 – Tanks #1 and #4 Maximum Criteria Emission Rates

SN	Pollutant	lb/hr	tpy
01	VOC	1.0	1.2
04	VOC	0.5	

2. Tanks #1 and #4 shall be used only for the storage of diesel fuel (#2 fuel oil). [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

SN-02, SN-03, SN-05, SN-13, SN-14, SN-16, SN-17

Tanks #2, #3, #5, #6, #7, #8, and #9

Description

Tank #2 (SN-02) is a 1,996,056 gallon internal floating roof tank with mechanical shoe seal as allowed in NSPS Subpart Ka. The tank was installed in 1980 and the seal was replaced in 2005.

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 mechanical shoe seal. It was installed in 1994. In accordance with Plantwide Condition #19, AT&T submitted a written notification on August 8, 2003 of a change in service for Tank #6 to store jet fuel.

Tank #7 (SN-14) is a 402,381 gallon internal floating roof tank with a primary and secondary seal. The current seal configuration may be changed to a mechanical shoe seal. It was installed in 1994. In accordance with Plantwide Condition #19, AT&T submitted a written notification on August 8, 2003 of a change in service for Tank #7 to store jet fuel.

Tank #8 (SN-16) is a 3,360,000 gallon internal floating roof tank with a mechanical shoe. It was installed in 2003. Tank #8 is permitted to store gasoline (RVP 13) and lower vapor pressure products. Furthermore, in accordance with Plantwide Condition #19, AT&T submitted a written notification on August 8, 2003 of a change in service for Tank #8 to store diesel fuel.

Tank #9 (SN-17) is 3,360,000 gallon internal floating roof tank with a mechanical shoe seal. It was installed in 2003. This tank is permitted to store gasoline (RVP 13) and lower vapor pressure products.

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, Tank #7, Tank #8, and Tank #9 are affected sources. Applicable requirements are outlined in the following specific conditions.

Specific Conditions

3. 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 Plantwide Conditions #7, #8, #15, and #17. [Regulation No. 19 §19.501 et seq. effective May 28, 2006, and 40 CFR Part 52, Subpart E]

Table 5 – Gasoline Tanks Maximum Criteria Pollutant Emission Rates

SN	Pollutant	lb/hr	tpy
02	VOC	1.2	---
03	VOC	1.2	---
05	VOC	1.9	---
13	VOC	1.7	---
14	VOC	1.8	---
16	VOC	1.9	---
17	VOC	1.9	---
Total		11.6	32.5

4. 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 Plantwide Conditions #7, #8, #15, and #17. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 6 – Gasoline Tanks Maximum Non-criteria Pollutant Emission Rates

SN	Pollutant	lb/hr	tpy
02	Benzene	0.0020	---
	Toluene	0.0083	---
	Xylene	0.0043	---
	Ethyl Benzene	0.0007	---
	Hexane	0.0068	---
	2,2,4-Trimethylpentane	0.0103	---
03	Benzene	0.0020	---
	Toluene	0.0083	---
	Xylene	0.0043	---
	Ethyl Benzene	0.0007	---
	Hexane	0.0068	---
	2,2,4-Trimethylpentane	0.0103	---
05	Benzene	0.0030	---
	Toluene	0.0129	---
	Xylene	0.0066	---
	Ethyl Benzene	0.0010	---
	Hexane	0.0104	---
	2,2,4-Trimethylpentane	0.0159	---
13	Benzene	0.0027	---
	Toluene	0.0115	---
	Xylene	0.0059	---
	Ethyl Benzene	0.0009	---
	Hexane	0.0093	---
	2,2,4-Trimethylpentane	0.0142	---

SN	Pollutant	lb/hr	tpy
14	Benzene	0.0030	---
	Toluene	0.0125	---
	Xylene	0.0065	---
	Ethyl Benzene	0.0010	---
	Hexane	0.0101	---
	2,2,4-Trimethylpentane	0.0142	---
16	Benzene	0.0030	---
	Toluene	0.0129	---
	Xylene	0.0066	---
	Ethyl Benzene	0.0010	---
	Hexane	0.0104	---
	2,2,4-Trimethylpentane	0.0159	---
17	Benzene	0.0030	---
	Toluene	0.0129	---
	Xylene	0.0066	---
	Ethyl Benzene	0.0010	---
	Hexane	0.0104	---
	2,2,4-Trimethylpentane	0.0159	---
Total	Benzene	0.02	0.05
	Toluene	0.08	0.21
	Xylene	0.04	0.11
	Ethyl Benzene	0.01	0.02
	Hexane	0.07	0.17
	2,2,4-Trimethylpentane	0.10	0.28

5. Tanks #2, #3, #5, #6, #7, #8, and #9 shall be used only for the storage of RVP 13 gasoline or lower vapor pressure products. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

6. The facility is subject to the malfunctions, breakdowns, and upset conditions 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: [Regulation No. 19 §19.1004 (H)(1)]

   a. The owner or operator notifies the Department of any such occurrence by the end of the next business day of the occurrence; and

   b. the owner or operator demonstrates to the Director that the suggested period of time for correction is as expeditious as practicable; and

   c. the breakdown or upset is determined by the Director to be unavoidable and not the result

of negligence; and

d. 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

e. the Director is immediately notified when corrective measures have been accomplished.

7. The gasoline delivery vessels at the facility shall be loaded through bottom loading. [Regulation No. 19 §19.1005 (A)(1) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

8. 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). [Regulation No. 19 §19.1005 (B)(1) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

9. All seals necessary to meet the conditions of §19.1005 (B)(1)(b) and (c) shall be maintained in good operating condition. [Regulation No. 19 §19.1005 (B)(2) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

10. All openings, except stub drains and those related to safety, are to be sealed with suitable closures when not in use. [Regulation No. 19 §19.1005 (B)(3) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

11. Tanks #2 and #3 are affected sources of 40 CFR Part 60, Subpart Ka. (See Attachment A.) Applicable provisions include, but are not limited to the following: [Regulation 19 §19.304 and 40 CFR Part 60, Subpart Ka]

    a. 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 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. [40 CFR Part 60 §60.112a (a)(2)]

    b. 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). [40 CFR Part 60 §60.115a (a)]

12. Tanks #5, #6, #7, #8, and #9 are affected sources of 40 CFR Part 60, Subpart Kb. (See Attachment B.) Applicable provisions include, but are not limited to the following: [Regulation No. 19 §19.304 and 40 CFR Part 60, Subpart Kb]

    a. Tanks #5, #6, #7, #8, and #9 shall be equipped with a fixed roof in combination with an internal floating roof equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof meeting the following specifications: [40 CFR Part 60 §60.112b (a)(1)]

        i. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

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

        iii. 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 the braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.

    b. 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. [40 CFR Part 60 §60.112b (a)(1)(i)]

    c. Each opening in a non-contact internal floating roof except for automatic bleeder vents and the rim space vents is to provide a projection below the liquid surface. [40 CFR Part 60 §60.112b (a)(1)(iii)]

    d. 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. [40 CFR Part 60 §60.112b (a)(1)(iv)]

e. 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. [40 CFR Part 60 §60.112b (a)(1)(v)]

f. 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. [40 CFR Part 60 §60.112b (a)(1)(vi)]

g. 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. [40 CFR Part 60 §60.112b (a)(1)(vii)]

h. 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. [40 CFR Part 60 §60.112b (a)(1)(viii)]

i. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [40 CFR Part 60 §60.112b (a)(1)(ix)]

j. 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. [40 CFR Part 60 §60.113b (a)(1)]

k. For tanks with a mechanical shoe seal, 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. [40 CFR Part 60 §60.113b (a)(2)]

l. For tanks with primary and secondary seals, 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. [40 CFR Part 60 §60.113b (a)(3)]

m. 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. [40 CFR Part 60 §60.113b (a)(4)]

n. 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. [40 CFR Part 60 §60.113b (a)(5)]

o. The facility shall keep records and furnish reports as required by this section for at least 2 years. [40 CFR Part 60 §60.115b]

p. 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). [40 CFR Part 60 §60.115b (a)(2)]

q. 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. [40 CFR Part 60 §60.115b (a)(3)]

r. 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. [40 CFR Part 60 §60.115b (a)(3)]

s. 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. [40 CFR Part 60 §60.116b (a)]

t. The facility shall keep readily accessible records showing the dimension and an analysis showing the capacity of the tank. [40 CFR Part 60 §60.116b (b)]

u. 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). [40 CFR Part 60 §60.116b (c)]

SN-11

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 have five lanes and 30 loading arms. All five loading lanes may be used for products with vapor pressures up to RVP 13 gasoline. This configuration limits loading to 215 mgal/hr of gasoline (RVP 13). 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

13. 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 Plantwide Conditions #13, #15, and #17. [Regulation No. 19 §19.501 et seq. effective May 28, 2006, and 40 CFR Part 52, Subpart E]

Table 7 – Loading Rack Maximum Criteria Pollutant Emission Rate

SN	Pollutant	lb/hr	tpy
11 (98% efficient flare)	VOC	146.3	132.2
	CO	19.8	17.9
	NO_X	3.7	3.3

14. 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 Plantwide Conditions #13, #15, and #17. [Regulation No. 18 §18.801 and A.C.A. §8-4-203 as referenced by §8 4-304 and §8-4-311]

Table 8 – Loading Rack Maximum Non-Criteria Emission Rate

SN	Pollutant	lb/hr	tpy
11	Benzene	0.22	0.20
	Toluene	1.03	0.93
	Ethyl Benzene	0.09	0.08
	Xylene	0.53	0.48
	Hexane	0.84	0.76
	2,2,4- Trimethylpentane	1.27	1.15

15. The vapor control systems at the facility shall be properly maintained and used to prevent gasoline vapors from being emitted into the atmosphere in excess of the rate listed in the table below. Compliance with this emission limit shall be demonstrated by compliance with Specific Condition #20. [Regulation No. 19 §19.1005(A)(3)]

Table 10 – Maximum Vapor Collection System VOC Loses

SN	Pollutant	mg VOC/liter of gasoline loaded
11	VOC	80

16. The maximum simultaneous pumping rate resulting in the maximum emission rate at the loading racks is 215 mgal/hr of RVP 13 gasoline. This bottleneck is demonstrated by the turnaround time for loading one truck in each of the five loading lanes. Any increases in the number of fueling lanes used to load RVP 13 gasoline or lower vapor pressure products (excluding diesel fuel and lower vapor pressure products) shall require a modification of this permit. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

17. The facility shall not allow a gasoline tank truck to be emptied or filled unless the gasoline truck: [§19.1005 (D)(1) of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

    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_2O) in five minutes when pressurized to a gauge pressure of 4,500 Pascals (18 in. of H_2O) or evacuated to a gauge pressure of 1,500 Pascals (6 in. of H_2O) 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.

18. The facility shall operate the vapor collection system and gasoline loading equipment in a manner that prevents: [§19.1005 (D)(2)(a) of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

    a. Gauge pressure from exceeding 4,500 Pascals (18 in. of H_2O) and vacuum from exceeding 1,500 Pascals (6 in. of H_2O) 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.

40 CFR Part 60, Subpart XX Conditions

19. 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 has been demonstrated by testing submitted on March 23, 2000. [Regulation No. 19 §19.304 and 40 CFR 60 §60.502(b)]

Table 9 – Maximum Vapor Collection System Total Organic Compound Loses

SN	Pollutant	mg TOC/liter gasoline loaded
11	TOC	35

20. The loading racks are an affected source of 40 CFR Part 60, Subpart XX. (See Attachment C.) Applicable provisions include, but are not limited to, the following: [Regulation 19 §19.304 and 40 CFR Part 60, Subpart XX]

    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. [40 CFR Part 60 §60.502(a)]

    b. The vapor collection system is designed to prevent total organic compound vapors collected at one loading rack from passing to another loading rack. [40 CFR Part 60 §60.502(d)]

    c. The loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures: [40 CFR Part 60 §60.502(e)]

        i. 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.

        ii. The facility shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the facility.

        iii. 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.

        iv. The facility shall notify the owner or operator of each non-vapor tight gasoline tank truck loaded at the facility within 3 weeks after the loading has occurred.

        v. 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. 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. [40 CFR Part 60 §60.502(f)]

e. 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). [40 CFR Part 60 §60.502(g)]

f. 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_2O) during product loading. This level is not to be exceeded when measured by the procedures specified in §60.503(d). [40 CFR Part 60 §60.502(h)]

g. 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_2O). [40 CFR Part 60 §60.502(i)]

h. 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. [40 CFR Part 60 §60.502(j)]

i. 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. [40 CFR Part 60 §60.503(b)]

j. 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). [40 CFR Part 60 §60.503 (c)]

k. The facility shall determine compliance with the standards of §60.502 (h) as outlined in §60.503 (d)(1) and (2). [40 CFR Part 60 §60.503 (d)]

l. 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. [40 CFR Part 60 §60.505 (a)]

m. 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: [40 CFR Part 60 §60.505 (b)]

i. Test title: Gasoline Delivery Tank Pressure Test - EPA Reference Method 27,

ii. Tank owner and address,

iii. Tank identification number,

iv. Testing location,

v. Date of test,

vi. Tester name and signature,

vii. Witnessing inspector, if any: name, signature, and affiliation, and

viii. Test results: actual pressure change in 5 minutes, mm of H_2O (average for 2 runs)

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:

i. Date of inspection,

ii. Findings (may indicate no leaks discovered; or location, nature, and severity of each leak),

iii. Leak determination method, and

iv. Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).

v. 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.

CAM Requirements

21. The permittee shall install, operate, and maintain a flame detection device on the flare's pilot at all times while the loading racks are in use. [Regulation No. 19 §19.703, 40 CFR Part 52 Subpart E, and Part §64.6]

22. An alarm (visible and/or audible) shall be triggered when the flame detection device fails to detect a flame while the loading racks are in use. [Regulation No. 19 §19.703, 40 CFR Part 52 Subpart E, and 40 CFR Part §64.6(c)(1)]

SN-12

Air Stripper

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.

SN-15

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

23. 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 #24. [Regulation No. 19 §19.501 et seq. effective May 28, 2006, and 40 CFR Part 52, Subpart E]

Table 11 – Fugitive Emission Rates

SN	Pollutant	lb/hr	tpy
--	VOC	0.2	0.5

24. 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- 562 valves, 1213 flanges, and 90 pump seals. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

25. 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. [Regulation 19 §19.705 and 40 CFR Part 52, Subpart E]

SN-18 and SN-19

Tank #18 and Tank #19

Tank #18 and Tank #19 are each 20,000 gallon vertical fixed roof tanks used to store bio-diesel.

26. 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 Plantwide Conditions #20 and #21. [§19.501 of Regulation 19 and 40 CFR Part 52, Subpart E]

Table #12

SN	Pollutant	lb/hr	tpy
18	VOC	1.6	0.07
19	VOC	1.6	0.05

27. Tank #18 and Tank #19 shall only be used to store bio-diesel fuel. [§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]

Section V: COMPLIANCE PLAN AND SCHEDULE

AT&T 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: PLANT WIDE CONDITIONS

1. The permittee will notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation No. 19 §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation No. 19 §19.410(B) and 40 CFR Part 52, Subpart E]

3. The permittee must test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) New Equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start-up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee will submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation No. 19 §19.702 and/or Regulation No. 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

4. The permittee must provide: [Regulation No. 19 §19.702 and/or Regulation No. 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

   a. Sampling ports adequate for applicable test methods;

   b. Safe sampling platforms;

   c. Safe access to sampling platforms; and

   d. Utilities for sampling and testing equipment.

5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee will maintain the equipment in good condition at all times. [Regulation No. 19 §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation No. 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

7. The facility shall comply with the following concentration limits for each type of gasoline. Compliance shall be demonstrated by Plantwide Condition #9. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 12 – Allowable HAP Concentration

HAP	Allowed Concentration (mg HAP/kg gasoline)
Ethyl Benzene	26,200
Toluene	80,600
Total Xylenes	139,800
Hexane	12,400
2,2,4 - Trimethylpentane	72,600

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

8. 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 #9. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 13 – Allowable Benzene Concentrations

Allowable Hourly Gasoline Throughput (mgal/hr)	Allowed Benzene Concentration (mg Benzene/kg gasoline)
215	5,000
210	5,119
200	5,375
190	5,658
180	5,972
170	6,324

In order to demonstrate compliance with the conditions of this table, the facility shall test the liquid benzene concentrations as required by Plantwide Condition #9. 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 >5,000 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 #9. At tested concentrations of benzene 5,000 mg/kg, no recordkeeping requirements are needed. Any exceedances of these concentrations shall require a permit modification.

9. The facility shall use a method approved by the Department to test the gasoline to determine compliance with the concentration limits of Plantwide Conditions #7 and #8. [Regulation No. 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

This testing shall be performed once per year. 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

10. No tank bottoms shall be processed on-site except for storage prior to off-site disposal. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

11. The facility shall keep records of the dates and amounts of tank bottoms shipped from the facility. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

12. Records of the tank bottoms shall be maintained on a twelve month rolling basis, updated monthly. These records shall be maintained on-site and submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

13. The total throughput of diesel (excluding biodiesel) at the facility shall be limited to 225,000,000 gallons per consecutive twelve month period. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

14. The permittee shall maintain monthly records and a 12 month rolling total that demonstrate compliance with Plantwide Condition #13. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. These records shall be maintained on-site and submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

15. The total throughput of RVP 13 gasoline or lower vapor pressure products (excluding diesel and jet fuel) at the facility shall be limited to 450,000,000 gallons per consecutive 12 month period. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

16. Records for the annual throughput of RVP 13 gasoline or lower vapor pressure products (excluding diesel and jet fuel) shall be maintained on a twelve month rolling basis to demonstrate compliance with Plantwide Condition #15. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. Such records shall be maintained on-site and submitted in accordance with General Provision #7. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

17. The total throughput of jet fuel at the facility shall be limited to 75,000,000 gallons per consecutive 12 month period. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

18. Records for the annual throughput of jet fuel shall be maintained on a twelve month rolling basis to demonstrate compliance with Plantwide Condition #17. The permittee shall update

the records by the fifteenth day of the month following the month to which the records pertain. These records shall be maintained on-site and submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E].

19. The permittee may change the service of Tanks #2, #3, #5, #6, #7, #8, and/or #9 from gasoline to diesel at the discretion of the facility. Written notification will be provided to the Administrator and the Department a minimum of 7 days in advance of the proposed changes. [Regulation No. 26 §26.802]

20. The total throughput of biodiesel at this facility shall be limited to 980,000 gallons per consecutive twelve month period. [§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]

21. The permittee shall maintain monthly records and a 12 month rolling total that demonstrate compliance with Plantwide Condition #20. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. These records shall be maintained on-site and submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

Title VI Provisions

22. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [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.

23. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]

    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.)

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.

24. 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.

25. 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.

26. The permittee can switch from any ozone-depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, "Significant New Alternatives Policy Program".

Permit Shield

27. 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 Table 14 of this condition. The permit specifically identifies the following as applicable requirements based upon the information submitted by the permittee in an application dated August 19, 2004.

Table 14 - Applicable Regulations

Source No.	Regulation	Description
Facility	Arkansas Regulation No. 19	Regulations of the Arkansas State Implementation Plan for Air Pollution Control
Facility	Arkansas Regulation No. 26	Regulations of the Arkansas Operating Air Permit Program

Source No.	Regulation	Description
02, 03	40 CFR Part 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, 1994.
05, 13, 14, 16, 17	40 CFR Part 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 Part 60, Subpart XX	Standards of Performance for Bulk Gasoline Terminals

The permit specifically identifies the following as inapplicable based upon information submitted by the permittee in an application dated August 19, 2004.

Table 15 - Inapplicable Regulations

Source No.	Regulation	Description
01-05, 13, 14, 16, 17	40 CFR Part 60, Subpart K	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
Facility	40 CFR Part 63, Subpart R	National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)

Section VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement is a significant activity even if this activity meets the criteria of §304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated June 27, 2005.

Table 16- Insignificant Activities

Description	Category
550 gallon Red Dye (For Diesel)	A3
1,000 gallon Phillips Jet A Additive	A3
2,000 gallon Shell Jet A Additive	A3
3,000 gallon Phillips Gasoline Additive	A3
4,000 gallon Generic Gasoline Additive	A3
8,000 gallon Lubricity Additive	A3
10,000 gallon Generic Gasoline Additive	A3
10,000 gallon Shell Gasoline Additive	A3
400 gallon Diesel Fuel	A3
400 gallon Diesel Fuel	A3
150 kw Emergency Generator (To be operated < 500 hrs/yr)	A13
250 kw Emergency Generator (To be operated < 500 hrs/yr)	A13

Pursuant to §26.304 of Regulation 26, the Department determined the emission units, operations, or activities contained in Regulation 19, Appendix A, Group B, to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

`

Section VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation No. 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.[40 CFR 70.6(b)(2)]

2. 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. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000]

3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will 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. [Regulation No. 26 §26.406]

4. 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, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation No. 26 §26.701(A)(2)]

5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation No. 26 §26.701(C)(2)]

    a. The date, place as defined in this permit, and time of sampling or measurements;

    b. The date(s) analyses performed;

    c. The company or entity performing the analyses;

    d. The analytical techniques or methods used;

    e. The results of such analyses; and

f. The operating conditions existing at the time of sampling or measurement.

6. The permittee must retain the records of all required monitoring data and support information for at least five (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. [40 CFR 70.6(a)(3)(ii)(B) and Regulation No. 26 §26.701(C)(2)(b)]

7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26 §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 C.F.R. 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation #26]

8. The permittee will report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.

   a. For all upset conditions (as defined in Regulation 19.601), the permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:

      i. The facility name and location,

      ii. The process unit or emission source deviating from the permit limit,

      iii. The permit limit, including the identification of pollutants, from which deviation occurs,

      iv. The date and time the deviation started,

      v. The duration of the deviation,

      vi. The average emissions during the deviation,

      vii. The probable cause of such deviations,

      viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and

      ix. The name of the person submitting the report.

   The permittee will make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information

required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report.

b. For all deviations, the permittee will report such events in semi-annual reporting and annual certifications required in this permit**.** This includes all upset conditions reported in 8a. above. The semi-annual report must include all the information as required in the initial and full report required in 8a**.** {40 CFR 70.6(a)(3)(iii)(B), Regulation No. 26 §26.701(C)(3)(b), Regulation No. 19 §19.601 and §19.602]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will 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. [40 CFR 70.6(a)(5), §26.701(E) of Regulation No. 26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311]

10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation No. 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, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation No. 26 §26.701(F)(1)]

11. 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 to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation No. 26 §26.701(F)(2)]

12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation No. 26 §26.701(F)(3)]

13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation No. 26 §26.701(F)(4)]

14. The permittee must 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 must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation No. 26 §26.701(F)(5)]

15. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [40 CFR 70.6(a)(7) and Regulation No. 26 §26.701(G)]

16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation No. 26 §26.701(H)]

17. If the permit allows different operating scenarios, the permittee will, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation No. 26 §26.701(I)(1)]

18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation No. 26 §26.702(A) and (B)]

19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation No. 26 §26.2. [40 CFR 70.6(c)(1) and Regulation No. 26 §26.703(A)]

20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation No. 26 §26.703(B)]

    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 required 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 assuring compliance with this permit or applicable requirements.

21. The permittee will submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation No. 26 §26.703(E)(3)]

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. Nothing in this permit will alter or affect the following: [Regulation No. 26 §26.704(C)]

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;

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. This permit authorizes only those pollutant-emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]