

STATEMENT OF BASIS

For the issuance of Air Permit # 0590-AOP-R23 AFIN: 60-00440

1. PERMITTING AUTHORITY:

Division of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

Sunoco LLC - Sunoco North Little Rock Terminal
2207 Central Airport Road
North Little Rock, Arkansas 72117

3. PERMIT WRITER:

Alexander Sudibjo

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Petroleum Bulk Stations and Terminals
NAICS Code: 424710

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

| Date of Application | Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment) | Short Description of Any Changes That Would Be Considered New or Modified Emissions |
|---------------------|---|---|
| 8/18/2022 | Renewal | None |

6. REVIEWER'S NOTES:

This is a Title V permit renewal for this facility. With this renewal, the facility is correcting the annual VOC emissions from the loading rack. There are no changes to the operation of the facility. The facility's permitted annual emissions are increasing by 0.3 tpy VOC.

7. COMPLIANCE STATUS:

As of August 18, 2022, there are no compliance issues with the facility. ECHO (<https://echo.epa.gov/detailed-facility-report?fid=110000902532>) shows no air violation identified as of March 29, 2022.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
If yes, were GHG emission increases significant?

b) Is the facility categorized as a major source for PSD? Y

- *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list*

If yes for 8(b), explain why this permit modification is not PSD. No emission changes or physical modifications.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

| Source | Pollutant | Regulation (NSPS, NESHAP or PSD) |
|---|-----------|----------------------------------|
| 01, 02, 03, 05, 13, 14, 16, 17, 23, 25, 31 | VOC | 40 CFR Part 60 Subpart Kb |
| 11 | VOC | 40 CFR Part 60 Subpart XX |
| Loading Rack, Gasoline Tanks, Equipment in Gasoline Service | HAPs | 40 CFR Part 63 Subpart BBBB |
| 29, 30 | HAPs | 40 CFR Part 63 Subpart ZZZZ |

10. UNCONSTRUCTED SOURCES:

| Unconstructed Source | Permit Approval Date | Extension Requested Date | Extension Approval Date | If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit |
|----------------------|----------------------|--------------------------|-------------------------|---|
| N/A | | | | |

11. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N
(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Rule 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit?
If not, explain why.

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

| Source | Inapplicable Regulation | Reason |
|--------|-------------------------|--------|
| N/A | | |

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

List sources potentially subject to CAM because they use a control device to achieve compliance and have pre-control emissions of at least 100 percent of the major source level. List the pollutant of concern and a brief summary of the CAM plan (temperature monitoring, CEMs, opacity monitoring, etc.) and frequency requirements of § 64.

| Source | Pollutant Controlled | Cite Exemption or CAM Plan Monitoring and Frequency |
|---|----------------------|---|
| 01, 02, 03, 05, 13, 14, 16, 17, 23, 25, 31, 11 | VOC | These are emission limitations or standards proposed after 11/15/1990 and are exempt per 40 C.F.R. § 64.2(b)(1)(i). |

13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

14. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

Based on Department procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

c) H₂S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H₂S Standards Y
 If exempt, explain: the facility does not have H₂S emissions.

15. CALCULATIONS:

| SN | Emission Factor Source (AP-42, Testing, etc) | Emission Factor and units (lbs/ton, lbs/hr, etc) | Control Equipment Type (if any) | Control Equipment Efficiency | Comments (Emission factor controlled/uncontrolled, etc) |
|--|---|---|---------------------------------|---|--|
| 01, 02, 03, 05, 13, 14, 16, 17, 23, 25, 31 | Tanks 4.09d AP-42 7.1 | Standing & Working Losses Roof Landings Losses | Internal Floating Roof Tank | --- | Calculated based on worst case, gasoline, roof landings |
| 04, 18, 19, 26, 27, 28 | Tanks 4.09d | Standing & Working Losses | Vertical Fixed Roof Tank | --- | |
| 11 | AP-42 5.2 | VOC Loading Loss =12.46 (SPM/T) <u>Lb/Mgal</u> Gasoline= 4.8407 Ethanol= 0.60 Diesel= 0.02 | Flare | Capture Eff. 98.7% (AP-42 5.2-6) Control Eff. 98.5% MFG Guarantee (10mg VOC/liter gas) | This facility is also subject to the more restrictive limits of 80 mg VOC/per liter of gasoline loaded from §19.1005(A)(3) and the limit of 35 mg TOC/per liter of gasoline loaded from 40 CFR 60, Subpart XX. The MFG guarantees only 10mg/l of gas |
| 15 | EPA Document: 1995 Protocol for Equipment Leak Emission Estimates | <u>Leak factors (lb/hr):</u> <u>Light/Heavy Liquid</u> Pumps = 1.19 E-3 Valves= 9.48 E-5 Flanges= 1.762 E-5 O E Lines= 2.87 E-4 Other= 2.87 E-4 <u>Vapor</u> Pumps = N/A Valves= 2.87 E-5 Flanges= 9.26 E-5 O E Lines= 2.87 E-4 Other= 2.65 E-4 | None | --- | Also, include butane blending |
| 29, 30 | AP-42 3.3 | Diesel | None | --- | |

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

| SN | Pollutants | Test Method | Test Interval | Justification |
|----|------------|----------------|---------------|------------------------|
| 11 | VOC | EPA Method 25A | Initial* | Plantwide Condition #3 |

*The initial compliance test was completed on July 24, 2014.

17. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

| SN | Parameter or Pollutant to be Monitored | Method (CEM, Pressure Gauge, etc.) | Frequency | Report (Y/N) |
|-----|--|------------------------------------|-----------|--------------|
| N/A | | | | |

18. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

| SN | Recorded Item | Limit | Frequency | Report (Y/N) |
|-----------------------|--|--|-----------|--------------|
| Controlled Tank Group | Distillate Throughput | 506,000,000 gal/yr | Monthly | Y |
| Controlled Tank Group | Gasoline Throughput | 795,000,000 gal/yr | Monthly | Y |
| Controlled Tank Group | Ethanol Throughput | 212,000,000 gal/yr | Monthly | Y |
| Controlled Tank Group | While in Gasoline Service: Days Standing Idle Filling Events Filling Events | 20 days/yr 10 events/yr 2 Simultaneously | Monthly | Y |
| Fixed Tank Group | Distillate Throughput | 94,000,000 gal/yr | Monthly | Y |
| 29, 30 | Maintenance | Listed in Permit | Monthly | N |
| | Hours of Operation | 500 hr/yr | | |

19. OPACITY:

| SN | Opacity | Justification for limit | Compliance Mechanism |
|--------|---------|-------------------------|-----------------------|
| 29, 30 | 20% | Rule 19.503 | Inspector Observation |

20. DELETED CONDITIONS:

| | |
|-----------|---------------------------|
| Former SC | Justification for removal |
| N/A | |

21. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

| Source Name | Group A Category | Emissions (tpy) | | | | | | |
|--|------------------|-------------------------|-----------------|------|----|-----------------|--------|-------|
| | | PM/ PM ₁₀ | SO ₂ | VOC | CO | NO _x | HAPs | |
| | | | | | | | Single | Total |
| 550 gal Red Dye Storage Tank | A-3 | | | 0.04 | | | | |
| 550 gal Red Dye Storage Tank | A-3 | | | 0.04 | | | | |
| 550 gal Red Dye Storage Tank | A-3 | | | 0.01 | | | | |
| 1,000 gal Gasoline/Jet Fuel Additive Storage Tank | A-3 | | | 0.01 | | | | |
| 2,000 gal Gasoline/Jet Fuel Additive Storage Tank | A-3 | | | 0.01 | | | | |
| 3,000 gal Gasoline/Jet Fuel Additive Storage Tank | A-3 | | | 0.01 | | | | |
| 4,000 gal Gasoline/Jet Fuel Additive Storage Tank | A-3 | | | 0.01 | | | | |
| 4,000 gal Gasoline/Jet Fuel Additive Storage Tank | A-3 | | | 0.01 | | | | |
| 4,000 gal Gasoline/Jet Fuel Additive Storage Tank | A-3 | | | 0.01 | | | | |
| 4,000 gal Gasoline/Jet Fuel Additive Storage Tank | A-3 | | | 0.01 | | | | |
| 10,000 gal Gasoline/Jet Fuel Additive Storage Tank | A-3 | | | 0.01 | | | | |
| 10,000 gal Gasoline/Jet Fuel Additive Storage Tank | A-3 | | | 0.01 | | | | |
| 8,000 gal Lubricity Additive Storage Tank | A-3 | | | 0.01 | | | | |
| 400 gal Diesel Fuel Storage Tank | A-3 | | | 0.01 | | | | |
| 400 gal Diesel Fuel Storage Tank | A-3 | | | 0.01 | | | | |
| 2,000 gal Tank Bottoms Pass Through Tank | A-3 | | | 0.01 | | | | |
| Group A-3 TOTAL | | | | 0.23 | | | | |
| 150 gpm Oil/Water Separator | A-13 | | | 0.02 | | | | |
| 150 gpm Oil/Water Separator | A-13 | | | 0.02 | | | | |
| 150 gpm Oil/Water Separator | A-13 | | | 0.02 | | | | |
| 15,000 gal Diesel Exhaust Fluid Tank | A-13 | | | | | N/A | | |
| 15,000 gal Diesel Exhaust Fluid Tank | A-13 | | | | | N/A | | |
| Group A-13 TOTAL | | | | 0.06 | | | | |

22. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

| |
|--------------|
| Permit # |
| 0590-AOP-R22 |

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Sunoco LLC - Sunoco North Little Rock
 Terminal
 Permit Number: 0590-AOP-R23
 AFIN: 60-00440

| | | | |
|---------------|--------------------|-----------------------------------|-------|
| \$/ton factor | 27.27 | Annual Chargeable Emissions (tpy) | 132.9 |
| Permit Type | Renewal No Changes | Permit Fee \$ | 0 |

| | |
|---|--------------------------|
| Minor Modification Fee \$ | 500 |
| Minimum Modification Fee \$ | 1000 |
| Renewal with Minor Modification \$ | 500 |
| Check if Facility Holds an Active Minor Source or Minor Source General Permit | <input type="checkbox"/> |
| If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$ | 0 |
| Total Permit Fee Chargeable Emissions (tpy) | 0.3 |
| Initial Title V Permit Fee Chargeable Emissions (tpy) | |

HAPs not included in VOC or PM: Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride

Air Contaminants: All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensible PM, H2S in TRS, etc.)

| Pollutant (tpy) | Check if Chargeable Emission | Old Permit | New Permit | Change in Emissions | Permit Fee Chargeable Emissions | Annual Chargeable Emissions |
|-------------------|------------------------------|------------|------------|---------------------|---------------------------------|-----------------------------|
| PM | | 0.2 | 0.2 | 0 | | |
| PM ₁₀ | | 0.2 | 0.2 | 0 | 0 | 0.2 |
| PM _{2.5} | | 0 | 0 | 0 | | |
| SO ₂ | | 0.2 | 0.2 | 0 | 0 | 0.2 |
| VOC | | 130.1 | 130.4 | 0.3 | 0.3 | 130.4 |
| CO | | 2.6 | 2.6 | 0 | | |
| NO _x | | 2.1 | 2.1 | 0 | 0 | 2.1 |
| Total HAPs | <input type="checkbox"/> | 2.77 | 2.77 | 0 | | |