

**STATEMENT OF BASIS**

for the issuance of Draft Air Permit # 2036-A

**1. PERMITTING AUTHORITY:**

Arkansas Department of Environmental Quality  
8001 National Drive  
Post Office Box 8913  
Little Rock, Arkansas 72219-8913

**2. APPLICANT:**

El Dorado Pipeline Company  
8000 Columbia 25  
Magnolia, Arkansas 71753

**3. PERMIT WRITER: Lloyd Davis**

**4. PROCESS DESCRIPTION AND SIC CODE:**

SIC Description: Pipeline, NEC  
SIC Code: 4619

**5. SUBMITTALS: February 7, 2003 and March 3, 2003**

**6. REVIEWER'S NOTES:**

This permit will allow the installation and operation of an 85,000 barrel storage tank in the El Dorado Pipeline Co.'s system to manage the crude oil supply and provide additional storage capacity for crude oil resulting from fluctuations in demand and supply at the refinery in El Dorado.

**7. COMPLIANCE STATUS:**

The following summarizes the current compliance status of the facility including active/pending enforcement actions and recent compliance activities and issues.

This is a new installation.

**8. APPLICABLE REGULATIONS:**

**PSD Applicability**

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, et cetera)?	N
Has this facility undergone PSD review in the past?	N
Is this facility categorized as a major source for PSD?	N
\$ 100 tpy and on the list of 28 (100 tpy)?	N
\$ 250 tpy all other	N

**PSD Netting**

Was netting performed to avoid PSD review in this permit? N

If so, indicate increases and decreases used in netting for PSD purposes only.

**Source and Pollutant Specific Regulatory Applicability**

Source	Pollutant	Regulation [NSPS, NESHAP (Part 61 & Part 63), or PSD only]
SN-01	VOC and HAPs	NSPS Subpart Kb

**9. EMISSION CHANGES:**

The following table summarizes plant wide emission changes associated with this permitting action.

Plant Wide Permitted Emissions (ton/yr)			
Pollutant	New Installation	Air Permit 2036-A	Change
PM/PM <sub>10</sub>		*	*
SO <sub>2</sub>		*	*
VOC		9.5	9.5
CO		*	*
NO <sub>x</sub>		*	*
Total HAPs		0.86	0.86

- Indicates no significant emissions

**10. MODELING:**

**Criteria Pollutants**

Examination of the source type, location, plot plan, land use, emission parameters, and other available information indicate that modeling is not warranted at this time.

**11. NON-CRITERIA POLLUTANTS**

Total HAP emissions are estimated at less than 1 tpy.

**12. CALCULATIONS:**

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled)
01	7.1.3 (2.1)	Formula lb/year	Seals as specified in 60.112b(c)(2)	Unknown	External Floating Roof

**13. TESTING REQUIREMENTS:**

This permit does not require stack testing of the storage tank..

**14. MONITORING OR CEMS**

There are no parameters that must be monitored with CEMS or other devices. Emission control is based on the tank design.

**15. RECORD KEEPING REQUIREMENTS**

The following are items (such as throughput, fuel usage, VOC content of coating, etc) that must be tracked and recorded, frequency of recording and whether records are needed to be included in any annual, semiannual or other reports.

SN	Recorded Item	Limit (as established in permit)	Frequency*	Report (Y/N)**
01	Crude oil throughput	25.6 million barrels (1,075 million tons) of product per consecutive 12-month period.	Monthly	No
01	VOL storage and period	Total should not exceed 25.6 MMbarrels per 12 consecutive months	Varies	No
01	Maximum vapor pressure	11.11 psia	Varies	No

\* Indicate frequency of recording required for the item (Continuously, hourly, daily, etc.)

\*\* Indicates whether the item needs to be included in reports

**16. OPACITY**

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
01	0	VOCs are invisible	Inspection

**17. DELETED CONDITIONS:**

There is no previous permit.

**18. VOIDED, SUPERSEDED OR SUBSUMED PERMITS**

List all active permits voided/superseded/subsumed by issuance of this permit for this facility.

Permit #
None

**19. CONCURRENCE BY:**

The following supervisor concurs with the permitting decision:

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Thomas Rheaume, P.E.