

# ADEQ MINOR SOURCE AIR PERMIT

Permit #: 2036-A

IS ISSUED TO:

El Dorado Pipeline Company – Tank 2002  
8000 Columbia 25  
Magnolia, AR 71753  
Columbia County  
AFIN: 14-00448

THIS PERMIT IS EL DORADO PIPELINE COMPANY'S AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 ET SEQ.) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

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Keith A. Michaels

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Date

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**Section I: FACILITY INFORMATION**

PERMITTEE: El Dorado Pipeline Company

AFIN: 14-00448

PERMIT NUMBER: 2036-A

FACILITY ADDRESS: 8000 Columbia 25  
Magnolia, AR 71753

COUNTY: Columbia

CONTACT POSITION: Chuck Hammock – Environmental Engineer

TELEPHONE NUMBER: 870-864-1289

REVIEWING ENGINEER: M. Lloyd Davis, P. E.

UTM North-South (Y) Zone 15 (3677.582 km)

UTM East-West (X): Zone 15 (486.075 km)



## **Section II: INTRODUCTION**

### **Summary**

This permit is for the installation of a new 85,000 barrel (3,570,000 gallons/13,514 cubic meters capacity) storage tank for the El Dorado Pipeline Company (SIC 4619) system. The tank will be installed east of Magnolia at 8000 Columbia 25 road on land leased from Lion Oil Trading and Transportation Company. The addition of the storage tank will give El Dorado Pipeline flexibility in managing the crude oil supply and will provide storage capacity when crude runs at the refinery are reduced and during emergency shutdowns of the refinery. This will enable the pipeline systems from Port Neches to Magnolia to continue operating when crude runs are reduced at the refinery, or if the pipeline system between Magnolia and El Dorado is down for maintenance. Installation of the new tank will also give El Dorado Pipeline Company the ability to segregate foreign crude from Arkansas crude. Emission rates of VOCs will be under 10 tpy.

### **Process Description**

Lion Oil Company's El Dorado refinery receives much of its crude oil supply from overseas and the Gulf of Mexico. The crude is shipped to Port Neches, Texas, and off-loaded into storage tanks. From there it is pumped through the Paline pipeline system to Longview, Texas and from Longview it is pumped through the Mid Valley pipeline system which transfers the oil via pipeline to Magnolia, Arkansas where their line ties into El Dorado Pipeline Company's crude oil line. The El Dorado Pipeline Company transfers the crude oil from Magnolia to the El Dorado refinery. Lion Oil Trading and Transportation Company and Magnolia Pipeline Company also have a crude oil gathering system that connects to El Dorado Pipeline Company's crude line at Magnolia.

Normally, crude oil received from Paline Pipeline Company will pass through the storage tank to the suction of El Dorado Pipeline Company's transfer pump in Magnolia. The crude oil volume in the storage tank will vary depending on the amount of oil coming up the pipeline systems and the amount of oil needed at the refinery. Crude oil from the Magnolia Pipeline Company will enter the storage tank only when the El Dorado Pipeline Company's transfer pump is not in operation.

For purposes of estimating potential emissions from the new storage tank, the assumption was made that all of the crude oil received from Paline Pipeline Company and Magnolia Pipeline Company passes through the tank. This is a very conservative assumption in that only a portion of the crude oil will actually pass through the tank. The maximum capacity of the pipeline systems is 70,000 barrels per day. Normally only approximately 40,000 barrels per day of that capacity can be utilized which represents the capacity of the refinery minus the amount of Arkansas crude that the refinery purchases. However, for emission estimating purposes it was assumed that the full 70,000 barrels per day passes through the new storage tank. The maximum vapor pressure has been estimated at 6.5159 psia (44.93 kPa) at 85° F storage temperature.

### Regulations

This facility is subject to regulation under the Arkansas Air Pollution Control Code (Regulation 18) and the State Plan of Implementation for Air Pollution Control (Regulation 19). The facility is subject to NSPS Subpart Kb - *Standards of Performance for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction or Modification Commenced after July 23, 1984.*

The applicable Subpart KB requirements apply to petroleum liquid storage tanks in excess of 39,890 gallons and storing liquids with an absolute vapor pressure between 0.75 psia (5.2 kPa) and 11.11 psia (76.6 kPa).

The following table is a summary of the facility's total emissions.

**Table 1 - Total Allowable Emissions**

Total Allowable Emissions		
Pollutant	Emissions Rates	
	lb/hr	tpy
PM	*	*
PM <sub>10</sub>	*	*
SO <sub>2</sub>	*	*
VOC	2.3	9.5
CO	*	*
NO <sub>x</sub>	*	*
Total HAPs	0.20	0.86

- No significant emissions

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### **Section III: PERMIT HISTORY**

This is the initial permit to allow construction and operation of the storage tank as part of the El Dorado Pipeline Company system.

**Section IV: EMISSION UNIT INFORMATION**

**Specific Conditions**

1. The permittee will not exceed the emission rates set forth in the following table. [§19.501 et seq. of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective February 15, 1999 (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 2 - Criteria Pollutants**

<b>SN</b>	<b>Description</b>	<b>Pollutant</b>	<b>lb/hr</b>	<b>Tpy</b>
SN-01	Pipeline Crude Oil Storage Tank	VOC	2.3	9.5

2. The permittee will not exceed the emission rates set forth in the following table. [§18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 3 - Non-Criteria Pollutants**

<b>SN</b>	<b>Description</b>	<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
SN-01	Pipeline Crude Oil Storage Tank	HAPs	0.20	0.86

3. Visible emissions will not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 4 - Visible Emissions**

<b>SN</b>	<b>Limit</b>	<b>Regulatory Citation</b>
SN-01	0%	§18.501 of Regulation #18

4. The permittee will not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [§18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-31]
5. The permittee will not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [§18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-31]

**SN-01 Conditions**

6. The permittee will not process more than 25.6 million barrels (1,075 million tons) of product at the facility per consecutive 12-month period. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
7. The permittee will maintain monthly records which demonstrate compliance with Specific Condition #6. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will make the records available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**NSPS Requirements**

8. The Tank (SN-01) will have an external floating roof meeting the requirements of §60.112b(a)(2). [§19.304 and 40 CFR Part §60.112b(a)(2) ]
9. The permittee will keep records relating to the design, dimensions, and capacity of the tank (SN-01) that demonstrate compliance with §60.112b(a)(2) until such time as the tank is removed from service. The permittee will make the records available to Department personnel upon request. [§19.304 and 40 CFR Parts §60.112b(a)(2) and §60.116b(b)]
10. The permittee will comply with the inspection requirements of §60.113b(b)(1) after installing the control equipment specified for tanks with an external floating roof as required in Specific Condition #8, within 60 days of the initial fill with VOL and at least once every five years thereafter. [§19.304 and 40 CFR Part §60.113(b)(1)]
11. The permittee will maintain a record of the VOL stored, the period of storage and the maximum true vapor pressure of the VOL during the respective storage period for at least two years. The maximum true vapor pressure is calculated according to the methods of §60.116b(e) or of §60.116b(2). [§19.304 and 40 CFR Parts §60.116b(e) and of §60.116b(2).]
12. The permittee has furnished the Administrator with a report dated February 28, 2003, that describes the control equipment on SN-01 and certifies that the control equipment meets the specifications in §60.112(b)(a)(2) and §60.113(b)(b)(2) and (b)(3). [§19.304 and 40 CFR Parts §60.112(b)(a)(2) and §60.113(b)(b)(2) and (b)(3)]



**Section V: INSIGNIFICANT ACTIVITIES**

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated **February 7, 2003**.

**Table 5 - Insignificant Activities**

<b>Description</b>	<b>Category</b>
None listed	

**Section VI: GENERAL CONDITIONS**

1. Any terms or conditions included in this permit that 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 that 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. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
3. The permittee will notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [§19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [§19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit--such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [§19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [§19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Arkansas Department of Environmental  
Quality  
ATTN: Compliance Inspector Supervisor  
Post Office Box 8913  
Little Rock, AR 72219

7. The permittee will 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) newly constructed or 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) existing equipment already operating according to the time frames set forth by the Department. 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 must submit compliance test results to the Department within thirty (30) days after the completion of testing. [§19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
8. The permittee will provide: [§19.702 of Regulation 19 and/or §18.1002 of Regulation 18 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
  - d. Utilities for sampling and testing equipment
9. The permittee will operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee will maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [§19.303 of Regulation 19 and/or §18.1104 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. Pursuant to, if the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [§19.601 of Regulation 19 and/or §18.1101 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
  - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.

- c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, it need not be submitted again.
11. The permittee shall allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit
  - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act
  - c. To inspect any monitoring equipment or monitoring method required in this permit
  - d. To sample any emission of pollutants
  - e. To perform an operation and maintenance inspection of the permitted source
12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [§19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [§19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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15. Pursuant to, this permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

## APPENDIX A

NSPS Subpart Kb

**El Dorado Pipeline Company – Tank 2002**  
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Request for PDS Invoice				
Invoice Number <i>(assigned when invoice printed)</i>	PDS-			
AFIN r	14-00448			
Name <i>(for confirmation only)</i>	El Dorado Pipeline Company			
Invoice Type (pick one) r	Initial X	Mod	Variance	
	Annual	Renewal	Interim Authority	
Permit Number r	2036-A			
Media Code r	A			
Fee Code or Pmt Typer	MS			
Fee Description <i>(for confirmation only)</i>	Minor Source			
Amount Due r <i>(whole dollar amount only)</i>	\$400			
Printed Comment <i>(600 characters maximum)</i>	(\$19.93/ton)(9.5 tpy) = \$189			
<i>Note: The information below is for use by the requesting division if desired; it will not print on the invoice.</i>				
Engineer	Lloyd Davis			
Paid? (yes/no)				
Check number				
Comments				
r <b>Required data</b> (See "g:\Misc\PDS_FeeCodes.wpd" for descriptions and discussions of fee codes)				
Request submitted by:		Date:		

## Public Notice

Pursuant to A.C.A. §8-4-203, and the regulations promulgated thereunder, the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

This permit application is for the installation of a new 85,000 barrel (3,570,000 gallons capacity) storage tank for the El Dorado Pipeline Company system (SIC 4619). The tank will be installed east of Magnolia at 8000 Columbia 25 road on land leased from Lion Oil Trading and Transportation Company. Total emissions of Volatile Organic Compounds will be less than 10 ton per year and less than 1 ton per year of Hazardous Air Pollutants.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Doug Szenher, Public Affairs Supervisor. Citizens desiring technical information concerning the application or permit should contact Lloyd Davis, Engineer. Both Doug Szenher and Lloyd Davis can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the *Columbia County Public Library, 220 East Main Street, Magnolia, AR 71753*. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal, or the proposed modification, to the Department at the above address - Attention: Doug Szenher. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8).

Dated this

Marcus C. Devine