

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2036-AR-1 AFIN: 14-00448

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Delek Logistics Services Company, LLC
800 Columbia Road 25
Magnolia, Arkansas 71753

3. PERMIT WRITER:

Alexander Sudibjo

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Pipeline Transportation of Crude Oil
NAICS Code: 486110

5. SUBMITTALS:

12/23/2013

6. REVIEWER'S NOTES:

With this modification, the facility is requesting to add existing tanks (T-337, T-435, and T-437), to install a new tank (T-2013), and to add the fugitive emissions from valves, connectors, and pumps as an A-13 insignificant activity. The facility's permitted emission is increasing by 28.5 tpy VOC.

7. COMPLIANCE STATUS:

As of December 23, 2013, there are no compliance issues with the facility. Enforcement has been notified of the unpermitted tanks.

8. PSD APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N

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- b) Is the facility categorized as a major source for PSD? N
- *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list, or*
 - *CO₂e potential to emit $\geq 100,000$ tpy and ≥ 100 tpy/ ≥ 250 tpy of combined GHGs?*

If yes, explain why this permit modification is not PSD.

9. GHG MAJOR SOURCE (TITLE V):

Indicate one:

- Facility is classified as a major source for GHG and the permit includes this designation
- Facility does not have the physical potential to be a major GHG source
- Facility has restrictions on GHG or throughput rates that limit facility to a minor GHG source. Describe these restrictions: _____

10. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-01 & 2013	VOC	NSPS Kb

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. NAAQS EVALUATIONS AND NON-CRITERIA POLLUTANTS:

a) NAAQS:

Pursuant to Act 1302 of the Regular Session of the 89th General Assembly of the State of Arkansas, no dispersion modeling was performed by ADEQ because it was not voluntarily proposed and agreed to by the facility. No other information was submitted by the applicant. Criteria pollutants were not evaluated for impacts on the NAAQS.

b) Non-Criteria Pollutants:

Non-criteria modeling were not performed because all HAPs are below 10 tpy with TLV above 1 mg/m³.

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01	AP-42 7.1.3 (2.1)	Formula lb/year	Seals as specified in 60.112b(a)(2)	Unknown	External Floating Roof
337	TANKS 4.0.9d	0.06 MMgal/yr	-	-	Vertical Fixed Roof
435		36.25 MMgal/yr	-	-	
437		18.80 MMgal/yr	-	-	External Floating Roof
2013		75.61 MMgal/yr	Seals as specified in 60.112b(a)(2)	Unknown	

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
None				

15. 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)
None				

16. RECORDKEEPING REQUIREMENTS:

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

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
Facility	Crude oil throughput	25.6 million barrels (1,075 million tons)	Monthly	No

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		of product per consecutive 12-month period.		
01 and 2013	VOL storage and period	Total should not exceed 25.6 MMbarrels per 12 consecutive months	Varies	No
01 and 2013	Maximum vapor pressure	As calculated by §60.116b(e)	Varies	No
01 and 2013	Design, dimensions, and capacity	-	Initial	No

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
All Tanks	0%	§18.501	Observation

18. DELETED CONDITIONS:

Former SC	Justification for removal
	None

19. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Fugitive emissions (valves, connectors/flanges, pumps)	A-13			4.07				

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

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APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 08-26-13

Facility Name: Delek Logistics
 Services Company, LLC
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			Old Permit	New Permit
\$/ton factor	23.42	Permit Predominant Air Contaminant	9.5	38
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	28.5	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	667.47	
		Annual Chargeable Emissions (tpy)	38	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	0	0	0
PM ₁₀	0	0	0
SO ₂	0	0	0
VOC	9.5	38	28.5
CO	0	0	0
NO _x	0	0	0
Total HAPs	0.86	9.81	8.95
Benzene	0	1.07	1.07
n-Hexane	0	8.74	8.74