STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0590-AOP-R19 AFIN: 60-00440

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

AMID NLR LLC - North Little Rock
2207 Central Airport Road
North Little Rock, Arkansas 72117

3. PERMIT WRITER:

Elliott Marshall

4. NAICS DESCRIPTION AND CODE:

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

5. ALL SUBMITTALS:

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
4/24/2017	Minor Mod	Adding fugitive equipment

6. REVIEWER'S NOTES:

American Midstream Partners, LP assumed ownership of the JP Energy ATT, LLC refined fuels terminal located at 2207 Central Aiport Road in North Little Roc, and changed the facility name to AMID NLR LLC. This modification is to add fugitive equipment (pumps, valves, flanges, etc.) to facilitate the rail car loading of transmix. The physical change involves additional piping from manifold to the rail spur and adding vapor return lines to the vapor recovery system. This permit modification results in an increase of 0.1 tpy of VOC at SN-15. AMID NLR intends to load the transmix using the existing facility wide throughput limit of 795,000,000 gallons of RVP 13.5 gasoline or lower vapor pressure product; there will be no increase in throughput limits.

7. COMPLIANCE STATUS:

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

The facility was last inspected on August 8, 2017. The inspector noted compliance issues related to the facility not having the required records and not submitting the required reports on time.

8. PSD APPLICABILITY:

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

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, explain why this permit modification is not PSD.

The total annual permitted emission rate limit changes do not exceed the PSD threshold for review

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	NSPS 40 CFR Part 60 Subpart Kb
11	VOC	NSPS 40 CFR Part 60 Subpart XX
Loading Rack, Gasoline Tanks, Equipment in Gasoline Service	HAPs	NESHAP 40 CFR Part 63 Subpart BBBBBB
29, 30	HAPs	NESHAP 40 CFR Part 63 Subpart ZZZZ

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. AMBIENT AIR EVALUATIONS:

a) Reserved.

b) Non-Criteria Pollutants:

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value

(mg/m^3), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

In permit modification #0590-AOP-R17, there were no HAP emission rate limit changes. So, the PAER table was not updated. This information is from permit revision 16. The proposed maximum hourly emissions include a roof landing event occurring at each tank. Emergency generator emissions are not modeled due to their intermittent usage.

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = 0.11 × TLV	Proposed Max. lb/hr	Pass?
Benzene	1.60	0.18	5.14135	No
Toluene	75.36	8.29	2.728	Yes
Ethylbenzene	434.19	47.76	0.10622	Yes
Xylene	434.19	47.76	0.2854	Yes
Hexane	176.24	19.39	18.2021	Yes
2,2,4 - Trimethylpentane	350.00	38.50	2.9605	Yes

2^{nd} Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

In permit modification #0590-AOP-R17, there were no HAP emission rate limit changes. So, the PAIL table was not updated. In permit modification #0590-AOP-R16, Benzene was modeled using the standing and working losses for each tank as well as tank landings occurring at two of the biggest tanks (SN-17 and SN-25) simultaneously. This limits the permittee to landing no more than two (2) tanks simultaneously. Since five (5) years of meteorological data was used, the 2^{nd} highest concentration was taken.

Pollutant	PAIL ($\mu g/m^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu g/m^3$)	Pass?
Benzene	16.0	15.43	Yes

12. 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)

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	---	
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) Lb/Mgal Gasoline= 4.8407 Ethanol= 0.60 Diesel= 0.02	Flare	Capture Eff. 98.7% (AP-42 5.2-6) Control Eff. 98.3% 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	Leak factors (lb/hr): Light/Heavy Liquid 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 Vapor 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	---	

13. 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

14. 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				

15. 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	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 Hours of Operation	Listed in Permit	Monthly	N

16. OPACITY:

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

17. DELETED CONDITIONS:

Former SC	Justification for removal
None	

18. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		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				
Total (Group A-3)				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						
Total (Group A-13)				0.06				

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
0590-AOP-R18

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: AMID NLR, LLC
Permit Number: 0590-AOP-R19
AFIN: 60-00440

$/ton factor	23.93	Annual Chargeable Emissions (tpy)	138.8
Permit Type	Minor Mod	Permit Fee $	500

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	☐
If Hold Active Permit, Amt of Last Annual Air Permit Invoice $	0
Total Permit Fee Chargeable Emissions (tpy)	0.1
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		136.2	136.3	0.1	0.1	136.3
CO		2.6	2.6	0		
NO_X		2.1	2.1	0	0	2.1
Benzene	☐	0.496	0.496	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Toluene	☐	0.292	0.292	0		
Ethyl Benzene	☐	0.0341	0.0341	0		
Xylene	☐	0.0402	0.0402	0		
Hexane	☐	1.82	1.82	0		
2,2,4 - Trimethylpentane	☐	0.272	0.272	0		