

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0590-AOP-R20 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:

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
5/16/2018	Renewal	-Update emission rates based on revised calcs. -Update emissions to be consistent with current Non-Criteria Pollutant Control Strategy

6. REVIEWER'S NOTES:

American Midstream Partners, LP assumed ownership of the JP Energy ATT, LLC refined fuels terminal located at 2207 Central Airport Road in North Little Rock, and changed the facility name to AMID NLR LLC. This application was submitted as a renewal. In addition to renewing the current Title V permit, the facility requests the following changes:

1. Revise the name of tanks at SN-26, SN-27, and SN-28, from Vertical Fixed Tank 20, 21, and 22 to Vertical Fixed Tank 33, 34, and 35 respectively.
2. Update emission rates based on revised TANKS calculations for the storage tanks. There were some decreases in emissions associated with a change in the gasoline RVP.
3. Add Specific Condition #80 and #81 to limit the hours of operation at emergency generators SN-29 and SN-30 to 500 hr/yr each.
4. Add HAP emissions to emergency generators SN-29 and SN-30.
5. Replace Benzene, Toluene, Ethylbenzene, Xylene, Hexane, and 2,2,4 – Trimethylpentane with Total HAPs to be consistent with ADEQ’s current Non-Criteria Pollutant Control Strategy.

Permitted emissions are decreasing by 1.1 tpy VOC, 0.496 tpy Benzene, 0.292 tpy Toluene, 0.0341 tpy Ethylbenzene, 0.042 tpy Xylene, 1.82 tpy Hexane, 0.272 tpy 2,2,4-Trimethylpentane, and increasing by 2.89 tpy Total HAPs.

7. COMPLIANCE STATUS:

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

There are no pending or active enforcement actions.

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? 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 for 8(b), 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 BBBB
29, 30	HAPs	NESHAP 40 CFR Part 63 Subpart ZZZZ

10. 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 Regulation 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? N  
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		

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. 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 ADEQ 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) H<sub>2</sub>S Modeling:

The facility has no H<sub>2</sub>S emissions.

13. 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	---	
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	---	

14. 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.

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	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	20 days/yr	Monthly	Y
	Filling Events	10 events/yr		
	Filling Events	2 Simultaneously		
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		

17. OPACITY:

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

18. DELETED CONDITIONS:

Former SC	Justification for removal
None	

19. 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 <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	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				

20. 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-R19

## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Major Source

Revised 03-11-16

Facility Name: AMID NLR LLC - North Little Rock  
 Permit Number: 0590-AOP-R20  
 AFIN: 60-00440

\$/ton factor	23.93	Annual Chargeable Emissions (tpy)	137.6
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)	-1.1
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 <sub>10</sub>		0.2	0.2	0	0	0.2
PM <sub>2.5</sub>		0	0	0		
SO <sub>2</sub>		0.2	0.2	0	0	0.2
VOC		136.2	135.1	-1.1	-1.1	135.1
CO		2.6	2.6	0		
NO <sub>x</sub>		2.1	2.1	0	0	2.1
Benzene	<input type="checkbox"/>	0.496	0	-0.496		



Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Toluene	<input type="checkbox"/>	0.292	0	-0.292		
Ethyl Benzene	<input type="checkbox"/>	0.0341	0	-0.0341		
Xylene	<input type="checkbox"/>	0.042	0	-0.042		
Hexane	<input type="checkbox"/>	1.82	0	-1.82		
2,2,4-Trimethylpentane	<input type="checkbox"/>	0.272	0	-0.272		
Total HAPs	<input type="checkbox"/>	0	2.89	2.89		