

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2379-AR-1 AFIN: 46-00675

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Delek Logistics Operating, LLC.  
Approximately 7197 CR 10: West side CR 10 North of Intersection with CR 22  
Fouke, Arkansas 71837

3. PERMIT WRITER:

Amanda Leamons

4. NAICS DESCRIPTION AND CODE:

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

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
8/25/2020	Modification	Add H <sub>2</sub> S emissions to SN-06 (existing source) and add biocide usage as SN-07 and add inhibitor usage to insignificant activities.

6. REVIEWER'S NOTES:

The facility requested that the H<sub>2</sub>S emissions be added to the existing truck unloading source. Those emissions have been added and were modeled using AERMOD (LAKES). The modeling results are listed in #12 paragraph c.

Both inhibitor and biocide usage were requested as insignificant activities. The facility showed that the inhibitor usage was based on the pump capacity and that the VOC

contents were constant and at those rates it still qualified as an insignificant activity. However, the biocide usage has been added as a source because at the maximum throughput allowed by the pump, it exceeds the group A-13 limits, when added to the inhibitor emission levels.

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 active/pending enforcement actions or recent compliance activities at this facility.

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? NA

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*

If yes for 8(b), explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-04	VOC and HAP	NSPS Kb

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
<i>None Permitted</i>				

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 DEQ 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. No single HAP is above 0.1 lb/hr and 0.2 tpy, with the lowest PAER limit at 0.88; furthermore, none of the reported HAPs have a TLV less than 1.0 mg/m<sup>3</sup>. H<sub>2</sub>S is modeled in part c below.

c) H<sub>2</sub>S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation; refer to the Arkansas Code for details.

Is the facility exempt from the H<sub>2</sub>S Standards N

If exempt, explain: \_\_\_\_\_

Pollutant	Threshold value	Modeled Concentration (ppb)	Pass?
H <sub>2</sub> S	20 parts per million (5-minute average*)	0.0706 µg/m <sup>3</sup> 0.000051 ppm	Y
	80 parts per billion (8-hour average) residential area	0.02632 µg/m <sup>3</sup> 0.0189 ppb	Y
	100 parts per billion (8-hour average) nonresidential area	0.02632 µg/m <sup>3</sup> 0.0189 ppb	Y

1 hr Avg: 0.04298 µg/m<sup>3</sup>

\*To determine the 5-minute average use the following equation

$$C_p = C_m (t_m/t_p)^{0.2} \text{ where}$$

C<sub>p</sub> = 5-minute average concentration

C<sub>m</sub> = 1-hour average concentration

t<sub>m</sub> = 60 minutes

t<sub>p</sub> = 5 minutes

## 13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
1	TCEQ Technical Guidance	Used equations for valves, connections, etc.	N/A	N/A	Used TCEQ guidance and conservative estimates when possible
2	Facility provided calculations and gas composition	Varies	None	N/A	See calculations from R0 application page 56 and 58
3	AP-42 5.2	Varies	None	N/A	Assumes yearly cleanout
4	API manual of Petroleum Measurement Standards 19.2	Used API equation 19.2 for total loss from the tank	None	N/A	See R0 application pages 31-33
5	API manual of Petro. Measurement Stds 19.1	API equation 19.1 for total loss from the tank	None	N/A	See R0 application pages 43-54
6	Facility data	5.35scf vapor /truck 25% VOC 0.001% H2S	None	N/A	11,498 trucks/year
07	SDS	15 wt% VOC Sp. Gra.=1.0178 Max Usage 20 gal/day (based on injection pump capacity)	None	N/A	

## 14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
4	N/A	Gaps between the tank wall and the primary seal	At least once every 5 years	NSPS Kb
4	N/A	Gaps between the tank wall and the secondary seal	At least once per year	NSPS Kb

## 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)
N/A				

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	Throughput	2,190,000 Barrels of crude oil	Rolling 12 months	N
4	Throughput	1,825,000 Barrels of crude oil	Rolling 12 months	N
5	Throughput	365,000 Barrels of crude oil	Rolling 12 months	N
7	VOC Content	1.27 lb/gal	annually	N

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
No particulate sources			

18. DELETED CONDITIONS:

Former SC	Justification for removal
N/A	

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/PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
Corrosion Inhibitor Usage	A-13	0.0	0.0	1.2	0.0	0.0	0.31	0.34

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 #
2379-A



## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Delek Logistics  
 Operating, LLC.  
 Permit Number: 2379-AR-1  
 AFIN: 46-00675

\$/ton factor 23.93  
 Minimum Fee \$ 400  
 Minimum Initial Fee \$ 500

Permit Predominant Air Contaminant  
 Net Predominant Air Contaminant Increase

	Old Permit	New Permit
Permit Predominant Air Contaminant	12.5	17.4
Net Predominant Air Contaminant Increase	4.9	
Permit Fee \$	400	
Annual Chargeable Emissions (tpy)	17.4	

Check if Administrative Amendment

Permit Fee \$ 400  
 Annual Chargeable Emissions (tpy) 17.4

Pollutant (tpy)	Old Permit	New Permit	Change
PM	0	0	0
PM <sub>10</sub>	0	0	0
PM <sub>2.5</sub>	0	0	0
SO <sub>2</sub>	0	0	0
VOC	12.5	17.4	4.9
CO	0	0	0
NO <sub>x</sub>	0	0	0
H <sub>2</sub> S	0	0.01	0.01
Total HAP	0.49	0.49	0
Single HAP	0.2	0.2	0