



**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM**

STATE ONLY OPERATING PERMIT

Issue Date: June 2, 2020

Effective Date: July 3, 2020

Expiration Date: July 2, 2025

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated.

State Only Permit No: 23-00220

Synthetic Minor

Federal Tax Id - Plant Code: 82-2066222-1

Owner Information

Name: EDDYSTONE MARINE & RAIL TERM CO LLC
Mailing Address: 5 INDUSTRIAL HWY
EDDYSTONE, PA 19022-1524

Plant Information

Plant: EDDYSTONE MARINE & RAIL TERM CO/EDDYSTONE
Location: 23 Delaware County 23821 Eddystone Borough
SIC Code: 4789 Trans. & Utilities - Transportation Services, Nec

Responsible Official

Name: STEVE TURNBULL
Title: FACILITY DIRECTOR
Phone: (609) 315 - 5059

Permit Contact Person

Name: STEVE TURNBULL
Title: FACILITY DIRECTOR
Phone: (609) 315 - 5059

[Signature] _____

JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER



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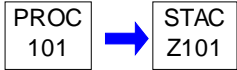
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Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	CRUDE OIL TANK (TANK 1)	N/A	CRUDE OIL
102	MARINE VESSEL LOADING	N/A	CRUDE OIL
CD02	VAPOR COLLECTION UNIT	N/A	Natural Gas
S02	VCU STACK		
Z101	TANK 1 STACK		

PERMIT MAPS

**SECTION B. General State Only Requirements****#001 [25 Pa. Code § 121.1]****Definitions.**

Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and in 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 127.446]**Operating Permit Duration.**

- (a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit.
- (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit.

#003 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446 & 127.703(b)&(c)]**Permit Renewal.**

- (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.
- (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.
- (c) The permittee shall submit with the renewal application a fee for the processing of the application and an additional annual administrative fee as specified in 25 Pa. Code § 127.703(b) and (c). The fees shall be made payable to "The Commonwealth of Pennsylvania - Clean Air Fund" and shall be for the amount specified in the following schedule specified in 25 Pa. Code § 127.703(b) and (c).
- (1) Three hundred dollars for applications filed during the 2000-2004 calendar years.
 - (2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.
- (d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413.
- (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).
- (f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

#004 [25 Pa. Code § 127.703]**Operating Permit Fees under Subchapter I.**

- (a) The permittee shall pay fees according to the following schedule specified in 25 Pa. Code § 127.703(b):
- (1) Three hundred dollars for applications filed during the 2000-2004 calendar years.
 - (2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.

This fee schedule shall apply to the processing of an application for an operating permit as well as the extension,

**SECTION B. General State Only Requirements**

modification, revision, renewal, and re-issuance of each operating permit or part thereof.

(b) The permittee shall pay an annual operating permit administrative fee according to the fee schedule established in 25 Pa. Code § 127.703(c).

(1) Two hundred fifty dollars for applications filed during the 1995-1999 calendar years.

(2) Three hundred dollars for applications filed during the 2000-2004 calendar years.

(3) Three hundred seventy-five dollars for applications filed during the years beginning in 2005.

(c) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania - Clean Air Fund".

#005 [25 Pa. Code §§ 127.450 (a)(4) and 127.464]**Transfer of Operating Permits.**

(a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.

(b) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership of the source shall be treated as an administrative amendment if the Department determines that no other change in the permit is required and a written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee and a compliance review form has been submitted to, and the permit transfer has been approved by, the Department.

(c) This operating permit is valid only for those specific sources and the specific source locations described in this permit.

#006 [25 Pa. Code § 127.441 and 35 P.S. § 4008]**Inspection and Entry.**

(a) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or authorized representatives of the Department to perform the following:

(1) Enter at reasonable times upon the permittee's premises where a source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;

(2) Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;

(3) Inspect at reasonable times, any facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;

(4) Sample or monitor, at reasonable times, any substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.

(b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.

(c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

#007 [25 Pa. Code §§ 127.441 & 127.444]**Compliance Requirements.**

(a) The permittee shall comply with the conditions of this operating permit. Noncompliance with this permit constitutes

**SECTION B. General State Only Requirements**

a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following:

- (1) Enforcement action
- (2) Permit termination, revocation and reissuance or modification
- (3) Denial of a permit renewal application

(b) A person may not cause or permit the operation of a source which is subject to 25 Pa. Code Article III unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued for the source is operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this State-Only permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

#008 [25 Pa. Code § 127.441]**Need to Halt or Reduce Activity Not a Defense.**

It shall not be a defense for the permittee in an enforcement action that it was necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

#009 [25 Pa. Code §§ 127.442(a) & 127.461]**Duty to Provide Information.**

(a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.

(b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

#010 [25 Pa. Code § 127.461]**Revising an Operating Permit for Cause.**

This operating permit may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

- (1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.
- (2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.
- (3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.
- (4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

#011 [25 Pa. Code §§ 127.450 & 127.462]**Operating Permit Modifications**

(a) The permittee is authorized to make administrative amendments, minor operating permit modifications and

**SECTION B. General State Only Requirements**

significant operating permit modifications, under this permit, as outlined below:

(b) Administrative Amendments. The permittee shall make administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.

(c) Minor Operating Permit Modifications. The permittee shall make minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.

(d) Permit modifications which do not qualify as minor permit modifications under 25 Pa. Code § 127.541 will be treated as a significant operating permit revision subject to the public notification procedures in §§ 127.424 and 127.425.

#012 [25 Pa. Code § 127.441]**Severability Clause.**

The provisions of this permit are severable, and if any provision of this permit is determined by a court of competent jurisdiction to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

#013 [25 Pa. Code § 127.449]**De Minimis Emission Increases.**

(a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:

(1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.

(2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

(b) The Department may disapprove or condition de minimis emission increases at any time.

(c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:

(1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.

(2) One ton of NO_x from a single source during the term of the permit and 5 tons of NO_x at the facility during the term of the permit.

(3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.

(4) Six-tenths of a ton of PM₁₀ from a single source during the term of the permit and 3.0 tons of PM₁₀ at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:

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(1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.

(2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.

(3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.

(4) Space heaters which heat by direct heat transfer.

(5) Laboratory equipment used exclusively for chemical or physical analysis.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:

(1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.

(2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.

(3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.

(f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.

(g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

(h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#014 [25 Pa. Code § 127.3]**Operational Flexibility.**

The permittee is authorized to make changes within the facility in accordance with the regulatory provisions outlined in 25 Pa. Code § 127.3 (relating to operational flexibility) to implement the operational flexibility requirements provisions authorized under Section 6.1(i) of the Air Pollution Control Act and the operational flexibility terms and conditions of this permit. The provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements include the following:

(1) Section 127.14 (relating to exemptions)

(2) Section 127.447 (relating to alternative operating scenarios)

(3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)

(4) Section 127.449 (relating to de minimis emission increases)

(5) Section 127.450 (relating to administrative operating permit amendments)

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(6) Section 127.462 (relating to minor operating permit modifications)

(7) Subchapter H (relating to general plan approvals and general operating permits)

#015 [25 Pa. Code § 127.11]**Reactivation**

(a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).

(b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

#016 [25 Pa. Code § 127.36]**Health Risk-based Emission Standards and Operating Practice Requirements.**

(a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)].

(b) A person challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act.

#017 [25 Pa. Code § 121.9]**Circumvention.**

No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#018 [25 Pa. Code §§ 127.402(d) & 127.442]**Reporting Requirements.**

(a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.

(b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.

(c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

Regional Air Program Manager
PA Department of Environmental Protection
(At the address given in the permit transmittal letter, or otherwise notified)

(d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.

(e) Any records, reports or information submitted to the Department shall be available to the public except for such

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records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.

#019 [25 Pa. Code §§ 127.441(c) & 135.5]**Sampling, Testing and Monitoring Procedures.**

(a) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.

(b) Unless alternative methodology is required by the Clean Air Act and regulations adopted thereunder, sampling, testing and monitoring required by or used by the permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139.

#020 [25 Pa. Code §§ 127.441(c) and 135.5]**Recordkeeping.**

(a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:

- (1) The date, place (as defined in the permit) and time of sampling or measurements.
- (2) The dates the analyses were performed.
- (3) The company or entity that performed the analyses.
- (4) The analytical techniques or methods used.
- (5) The results of the analyses.
- (6) The operating conditions as existing at the time of sampling or measurement.

(b) The permittee shall retain records of any required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.

(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

#021 [25 Pa. Code § 127.441(a)]**Property Rights.**

This permit does not convey any property rights of any sort, or any exclusive privileges.

#022 [25 Pa. Code § 127.447]**Alternative Operating Scenarios.**

The permittee is authorized to make changes at the facility to implement alternative operating scenarios identified in this permit in accordance with 25 Pa. Code § 127.447.

**SECTION B. General State Only Requirements****#023 [25 Pa. Code §135.3]****Reporting**

(a) If the facility is a Synthetic Minor Facility, the permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported. All air emissions from the facility should be estimated and reported.

(b) A source owner or operator of a Synthetic Minor Facility may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

#024 [25 Pa. Code §135.4]**Report Format**

If applicable, the emissions reports shall contain sufficient information to enable the Department to complete its emission inventory. Emissions reports shall be made by the source owner or operator in a format specified by the Department.

**SECTION C. Site Level Requirements****I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §121.7]****Prohibition of air pollution.**

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. Section 4003).

002 [25 Pa. Code §123.1]**Prohibition of certain fugitive emissions**

No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:

- (a) Construction or demolition of buildings or structures;
- (b) Grading, paving and maintenance of roads and streets;
- (c) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets;
- (d) Clearing of land;
- (e) Stockpiling of materials;
- (f) Open burning operations, as specified in 25 Pa. Code § 129.14;
- (g) Sources and classes of sources other than those identified in (a)-(f), above, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (1) The emissions are of minor significance with respect to causing air pollution; and
 - (2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

003 [25 Pa. Code §123.2]**Fugitive particulate matter**

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code § 123.1(a)(1)-(9) (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

004 [25 Pa. Code §123.31]**Limitations**

A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

005 [25 Pa. Code §123.41]**Limitations**

A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

- (a) equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour, or
- (b) equal to or greater than 60% at any time.

006 [25 Pa. Code §123.42]**Exceptions**

The opacity limitations of 25 Pa. Code § 123.41 shall not apply to a visible emission in either of the following instances:

- (a) When the presence of uncombined water is the only reason for failure to meet the limitations, or
- (b) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.

**SECTION C. Site Level Requirements**

(c) When the emission results from sources specified in 25 Pa. Code § 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions).

007 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

Site-wide emissions shall not exceed any of the following:

- (a) VOC - 24.0 tons in any 12 consecutive month period;
- (b) NOx - 24.0 tons in any 12 consecutive month period; and
- (c) HAPS - 9.9 tons per individual and 24.9 tons for total HAPS in any 12 consecutive month period.

008 [25 Pa. Code §129.14]**Open burning operations**

The permittee may not permit the open burning of material in the Southeast Air Basin, except when the open burning results from:

- (a) a fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer;
- (b) any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department;
- (c) a fire set solely for cooking food;
- (d) a fire set solely for recreational or ceremonial purposes; or
- (e) a fire set for the prevention and control of disease or pests, when approved by the Department.

II. TESTING REQUIREMENTS.**# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) If at any time the Department has cause to believe that air contaminant emissions from any source may be in excess of the limitations specified in this Permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).

(b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139 and the most current version of the DEP Source Testing Manual, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

III. MONITORING REQUIREMENTS.**# 010 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

- (a) A device approved by the Department and maintained to provide accurate opacity measurements; or
- (b) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

011 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

(a) The permittee shall monitor the facility, once per operating day, for the following:

- (1) Odors which may be objectionable (as per 25 Pa. Code §123.31);
- (2) Visible emissions (as per 25 Pa. Code §§123.41 and 123.42); and
- (3) Fugitive particulate matter (as per 25 Pa. Code §§ 123.1 and 123.2).

(b) Objectionable odors, fugitive particulate emissions, and visible emissions that are caused or may be caused by operations at the site shall:

**SECTION C. Site Level Requirements**

- (1) Be investigated;
- (2) Be reported to the facility management, or individual(s) designated by the permittee;
- (3) Have appropriate corrective action taken (for emissions that originate on-site); and
- (4) Be recorded in a permanent written log.

(c) After six (6) months of daily monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the monitoring frequency to weekly.

(d) After six (6) months of weekly monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.

(e) The Department reserves the right to change the above monitoring requirements at any time, based on but not limited to: the review of the compliance certification, complaints, monitoring results, and/or Department findings.

IV. RECORDKEEPING REQUIREMENTS.**# 012 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain a record of all monitoring of fugitive emissions, visible emissions and odors, including those that deviate from the conditions found in this permit. The record of deviations shall contain, at a minimum, the following items:

- (a) Date, time, and location of the incident(s);
- (b) The cause of the event; and
- (c) The corrective action taken, if necessary, to abate the situation and prevent future occurrences.

013 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall maintain records of all the facility's increases of emissions from the following categories:

- (a) De minimis increases without notification to the Department.
- (b) De minimis increases with notification to the Department, via letter.
- (c) Increases resulting from a Request for Determination (RFD) to the Department.
- (d) Increases resulting from the issuance of a plan approval and subsequent operating permit.

014 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall maintain monthly records of facility-wide NOx emissions, VOC emissions, and any individual HAP, and any combination HAP emissions, including 12-month rolling sums.

V. REPORTING REQUIREMENTS.**# 015 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 40 CFR Part 68.]

- (a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).
- (b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the threshold quantity at a facility. The permittee shall submit the RMP to the federal Environmental Protection Agency according to the following schedule and requirements:

- (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:

**SECTION C. Site Level Requirements**

- (i) Three years after the date on which a regulated substance is first listed under 40 CFR § 68.130; or,
- (ii) The date on which a regulated substance is first present above a threshold quantity in a process.

(2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.

(3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.

(c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

(d) If this facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:

(1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,

(2) Certify that this facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.

(e) If this facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.

(f) When this facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if the permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

016 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

(a) The permittee shall report malfunctions, emergencies or incidents of excess emissions to the Department. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. An emergency is any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator of a facility which requires immediate corrective action to restore normal operation and which causes the emission source to exceed emissions, due to unavoidable increases in emissions attributable to the situation. An emergency shall not include situations caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

(b) When the malfunction, emergency or incident of excess emissions poses an imminent danger to the public health, safety, welfare, or environment, it shall be reported to the Department and the County Emergency Management Agency by telephone within one (1) hour after the discovery of the malfunction, emergency or incident of excess emissions. The owner or operator shall submit a written or emailed report of instances of such malfunctions, emergencies or incidents of excess emissions to the Department within three (3) business days of the telephone report.

(c) The report shall describe the following:

- (1) Name, permit or authorization number, and location of the facility;
- (2) Nature and cause of the malfunction, emergency or incident;
- (3) Date and time when the malfunction, emergency or incident was first observed;
- (4) Expected duration of excess emissions;
- (5) Estimated rate of emissions; and
- (6) Corrective actions or preventative measures taken.

(d) Any malfunction, emergency or incident of excess emissions that is not subject to the notice requirements of paragraph (b) of this condition shall be reported to the Department by telephone within 24 hours (or by 4:00 PM of the next business

**SECTION C. Site Level Requirements**

day, whichever is later) of discovery and in writing or by e-mail within five (5) business days of discovery. The report shall contain the same information required by paragraph (c), and any permit specific malfunction reporting requirements.

(e) During an emergency an owner or operator may continue to operate the source at their discretion provided they submit justification for continued operation of a source during the emergency and follow all the notification and reporting requirements in accordance with paragraphs (b)-(d), as applicable, including any permit specific malfunction reporting requirements.

(f) Reports regarding malfunctions, emergencies or incidents of excess emissions shall be submitted to the appropriate DEP Regional Office Air Program Manager.

(g) Any emissions resulted from malfunction or emergency are to be reported in the annual emissions inventory report, if the annual emissions inventory report is required by permit or authorization.

VI. WORK PRACTICE REQUIREMENTS.**# 017 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

A person responsible for any source specified in 25 Pa. Code § 123.1 shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

(a) Use, where possible, of water or suitable chemicals, for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land;

(b) Application of asphalt, water, or other suitable chemicals, on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts;

(c) Paving and maintenance of roadways; and

(d) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or by other means.

018 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall ensure that the source(s) and air pollution control device(s), listed in Section A, of this operating permit, are operated and maintained in a manner consistent with safety good operating and maintenance practices, and in accordance with manufacturer's specifications.

019 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall immediately, upon discovery, implement measures which may include the application for the installation of an air cleaning device(s), if necessary, to reduce the air contaminant emissions to within applicable limitations, if at any time the operation of the source(s) identified in Section A of this permit, is causing the emission of air contaminants in excess of the limitations specified in, or established pursuant to, 25 Pa. Code Article III, or any other applicable rule promulgated under the Clean Air Act.

020 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee may not modify any air contaminant system identified in this permit prior to obtaining Department approval except those modifications authorized by Condition #013(g) of Section B of this permit.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VIII. COMPLIANCE CERTIFICATION.



SECTION C. Site Level Requirements

No additional compliance certifications exist except as provided in other sections of this permit including Section B (relating to State Only General Requirements).

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

**SECTION D. Source Level Requirements**

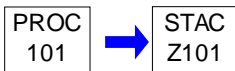
Source ID: 101

Source Name: CRUDE OIL TANK (TANK 1)

Source Capacity/Throughput:

N/A

CRUDE OIL

**I. RESTRICTIONS.****Control Device Efficiency Restriction(s).**

001 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.112b] Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 Standard for volatile organic compounds (VOC).

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

This internal floating roof tank affixed with a mechanical shoe seal shall store VOC liquids having a maximum true vapor pressure of less than 11.1 psia.

The permittee shall comply with the internal floating roof requirements found in 40 CFR § 60.112b(a)(1).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

III. MONITORING REQUIREMENTS.

002 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.113b] Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 Testing and procedures.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee shall visually inspect the internal floating roof and primary seal or the secondary seal (if one is in service) through the manholes and roof hatches on the fixed roof at least once every twelve (12) months. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within forty-five (45) days. If a failure that is detected during inspections required in this paragraph cannot be repaired within forty-five (45) days and if the vessel cannot be emptied within forty-five (45) days, a thirty (30) day extension may be requested from the Administrator in the inspection report required in 40 CFR § 60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

003 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.113b] Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 Testing and procedures.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the

**SECTION D. Source Level Requirements**

secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than ten (10) percent open area, the permittee shall repair the item(s) as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than ten (10) years.

IV. RECORDKEEPING REQUIREMENTS.**# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall record the commodity type and volume of crude oil received and shipped out each time a loading or unloading event takes place. The throughput shall be tallied on a monthly and a 12-consecutive month basis.

The true vapor pressure of the crude oil stored shall be recorded on a monthly basis.

005 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.115b]**Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984****Reporting and recordkeeping requirements.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee shall retain a record of each inspection performed on this tank for a minimum of five (5) years. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

006 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.116b]**Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984****Monitoring of operations.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee shall keep a life-time record showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

007 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.116b]**Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984****Monitoring of operations.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.

V. REPORTING REQUIREMENTS.**# 008 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.115b]****Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984****Reporting and recordkeeping requirements.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

If any of the conditions described in the annual inspection are detected, a report shall be furnished to the EPA Administrator and the Department within thirty (30) days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.



SECTION D. Source Level Requirements

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**SECTION D. Source Level Requirements**

Source ID: 102

Source Name: MARINE VESSEL LOADING

Source Capacity/Throughput:

N/A

CRUDE OIL

**I. RESTRICTIONS.****Control Device Efficiency Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

HAP emissions (measured as VOC) from marine tank vessel loading operations shall be reduced by a minimum of 99 weight-percent.

[Compliance with this condition assures compliance with 40 CFR § 63.562(b)(3).]

II. TESTING REQUIREMENTS.**# 002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.563]****Subpart Y - National Emission Standards for Marine Tank Vessel Tank Loading Operations****Compliance and performance testing.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

On an annual basis, the permittee shall perform a leak detection and repair (LDAR) inspection for the vapor collection system and control device. Inspections shall include all ductwork and piping connections to the VCU using EPA Method 21.

If evidence of a leak is found by visual, audible, olfactory, or any other detection method, all ductwork and piping connections to the vapor collection system and VCU shall be inspected to identify the leak and any leak shall be monitored within five (5) days by EPA method 21. Each detection of a leak shall be recorded and the leak shall be tagged until repaired.

When a leak is detected, a first effort to repair the leak shall be made within fifteen (15) days or prior to the next marine vessel loading operation, whichever is later.

III. MONITORING REQUIREMENTS.**# 003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.564]****Subpart Y - National Emission Standards for Marine Tank Vessel Tank Loading Operations****Monitoring requirements.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

If a valve could possibly vent to the atmosphere prior to the VCU, the permittee shall:

(a) measure and record the vent stream flow rate of each by-pass line every fifteen (15) minutes, and install (immediately downstream of the valve), operate and maintain a flow indicator and data recorded with either an audio or visual alarm. The alarm shall be checked every six (6) months to demonstrate that it is functioning properly and records of this check shall be maintained on site. This shall be done for each system that could divert the vent stream from the control device to the atmosphere; or

(b) visually inspect the seal or closure mechanism once during each marine vessel loading operation and at least every month to ensure that the valve is maintained in the closed position and that the vent stream is not diverted through the bypass lines; record all times when the car seals have been broken and the valve position has been changed. Each by-pass line valve shall be secured in the closed position with a car-seal or a lock and key type configuration.

**SECTION D. Source Level Requirements**

004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.564]
Subpart Y - National Emission Standards for Marine Tank Vessel Tank Loading Operations
Monitoring requirements.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

While the marine vessel is loaded under negative pressure, the permittee shall measure and record the loading pressure using a magnehelic gauge or equivalent device that has an audible and visible alarm that activates when the negative pressure is not attained. This alarm shall be located where it can be seen and heard when transferring cargo. The accuracy of the pressure device shall be verified annually with a reference pressure monitor (traceable to NIST standard of an independent pressure measurement device dedicated for this purpose).

005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.564]
Subpart Y - National Emission Standards for Marine Tank Vessel Tank Loading Operations
Monitoring requirements.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee shall comply with paragraph (a), (b), or (c) below. Compliance with (b) or (c) requires compliance with (d).

(a) Outlet VOC concentration. The permittee shall monitor the VOC concentrations at the exhaust point of the vapor combustion unit and record the output from the system. If monitoring the outlet VOC concentration established during the performance test, a data acquisition system shall record a concentration every fifteen (15) minutes and shall compute and record an average concentration each cycle (same time period or cycle as the performance test) and a 3-cycle block average concentration every third cycle. The permittee shall install, calibrate, operate, and maintain a CEMS consistent with the requirements of PS 8 to measure the VOC concentration. The daily calibration requirements are required only on days when marine tank vessel loading operations occur.

(b) Operating temperature determined during performance testing. If the baseline temperature was established during the performance test, the data acquisition system shall record the temperature every fifteen (15) minutes and shall compute and record an average temperature each cycle (same time period or cycle of the performance test) and a 3-cycle block average every third cycle.

(c) Manufacturer's recommended operating temperature. If the baseline temperature is based on the manufacturer recommended operating temperature, the data acquisition system shall record the temperature every fifteen (15) minutes and shall compute and record an average temperature each hour and a 3-hour block average every third hour.

(d) Temperature monitor. The permittee shall install, calibrate, operate, and maintain a temperature monitor accurate to within $\pm 5.6^{\circ}\text{C}$ ($\pm 10^{\circ}\text{F}$) or within 1 percent of the baseline temperature, whichever is less stringent, to measure the temperature. The monitor shall be installed at the exhaust point of the combustion device but not within the combustion zone. The permittee shall verify the accuracy of the temperature monitor once each calendar year with a reference temperature monitor (traceable to National Institute of Standards and Technology (NIST) standards or an independent temperature measurement device dedicated for this purpose). During accuracy checking, the probe of the reference device shall be at the same location as that of the temperature monitor being tested.

IV. RECORDKEEPING REQUIREMENTS.

006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.563]
Subpart Y - National Emission Standards for Marine Tank Vessel Tank Loading Operations
Compliance and performance testing.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

Prior to loading a marine vessel, the permittee shall obtain vapor tightness documentation (within the previous twelve (12) months) from the vessel in accordance with 40 CFR § 63.563.

Any vessels without the vapor-tightness documentation shall be loaded according to the alternate compliance methods outlined in 40 CFR § 63.563(a)(4)(ii-iv).

007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.565]
Subpart Y - National Emission Standards for Marine Tank Vessel Tank Loading Operations
Test methods and procedures.

**SECTION D. Source Level Requirements**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

On a monthly and 12 consecutive month basis, the permittee shall calculate and record HAP emissions from the marine vessel loading operations.

008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.567]
Subpart Y - National Emission Standards for Marine Tank Vessel Tank Loading Operations
Recordkeeping and reporting requirements.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee shall maintain records of each annual LDAR inspection for a minimum of five (5) years.

When a leak in the vapor collection system or control device is detected and repaired, the following information shall be maintained for five (5) years:

- (a) date of inspection;
- (b) all findings (location, nature, and severity of each leak);
- (c) leak determination method;
- (d) corrective action taken (date of each repair and repair interval); and
- (e) inspector name and signature.

009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.567]
Subpart Y - National Emission Standards for Marine Tank Vessel Tank Loading Operations
Recordkeeping and reporting requirements.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee shall maintain on-site an engineering report describing in detail the vapor collection system used to vent each stream to the control device. This report shall include all valves and vent pipes that could vent to the atmosphere thereby bypassing the control device and shall also identify which valves are car-sealed open and which valves are carsealed closed.

010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.567]
Subpart Y - National Emission Standards for Marine Tank Vessel Tank Loading Operations
Recordkeeping and reporting requirements.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

If the vapor collection system contains any valves that could divert the emission stream away from the control device, the permittee shall keep, for a minimum of five (5) years, readily accessible up-to-date records of:

- (a) all periods of time when flow is bypassing the control device and going directly to the atmosphere; and
- (b) all times when maintenance is performed on car-sealed valves, when the car-seal is broken, and when the valve position has been changed.

011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.567]
Subpart Y - National Emission Standards for Marine Tank Vessel Tank Loading Operations
Recordkeeping and reporting requirements.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee shall retain records of each marine vessel loaded to reflect the current test results concerning vapor tightness and leak testing. At a minimum, the following information shall be included:

- (a) test title;
- (b) marine vessel owner, address, and vessel ID number;
- (c) loading time, according to 40 CFR § 63.563(a)(4)(ii) or (iii), if appropriate;
- (d) testing date and location;
- (e) tester name and signature;

**SECTION D. Source Level Requirements**

- (f) test results from 40 CFR § 63.565(c)(1) or (2), as appropriate;
- (g) documentation provided under 40 CFR § 63.563(a)(4)(ii) and (iii)(B) showing that the repair of the leaking components attributed to a failure of a vapor-tightness test is technically infeasible without dry-docking the vessel; and
- (h) documentation that a marine tank vessel failing a pressure test or leak test has been repaired.

V. REPORTING REQUIREMENTS.

012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.567]
Subpart Y - National Emission Standards for Marine Tank Vessel Tank Loading Operations
Recordkeeping and reporting requirements.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

A signed and certified semi-annual report shall be postmarked by the 30th day following the end of each calendar half (ending June 30 and December 31). This report shall be sent to the Department and the US EPA Region 3 and shall contain the following information:

- (a) number, duration, and brief description for each type of malfunction which occurred during the reporting period which caused or may have caused any applicable emission limitation to be exceeded; and
- (b) a description of the actions taken by the permittee during a malfunction of the source, piping, and/or control device to minimize emissions in accordance with 40 CFR § 63.562(e), including steps taken to correct the malfunction.

013 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.567]
Subpart Y - National Emission Standards for Marine Tank Vessel Tank Loading Operations
Recordkeeping and reporting requirements.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

Electronic submittal requirements:

- (a) Within 60 days after the date of completing each performance test, as defined in 40 CFR § 63.2, and as required in 40 CFR 60, Subpart Y, the permittee shall submit performance test data, except opacity data, electronically to EPA's Central Data Exchange by using the Electronic Reporting Tool (ERT) (see <http://www.epa.gov/ttn/chief/ert/index.html>) or other compatible electronic spreadsheet. Only data collected using test methods compatible with ERT are subject to this requirement to be submitted electronically into EPA's WebFIRE database.
- (b) All reports required by 40 CFR 60, Subpart Y not subject to the requirements in paragraph (a) above must be sent to the Administrator of the EPA at the appropriate address listed in 40 CFR § 63.13. If acceptable to both the Administrator and the permittee, these reports may be submitted on electronic media. The Administrator retains the right to require submittal of reports subject to paragraph (a) above in paper format.
- (c) A copy of all reports shall be submitted to the Southeast office of PADEP, located in Norristown.

VI. WORK PRACTICE REQUIREMENTS.

014 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.562]
Subpart Y - National Emission Standards for Marine Tank Vessel Tank Loading Operations
Standards.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee shall:

- (a) maintain, and operate a vapor collection system that is designed to collect HAP vapors displaced from marine tank vessels during marine tank vessel loading operations and to prevent HAP vapors collected at one loading berth from passing through another loading berth to the atmosphere;
- (b) only load vessels that are equipped with vapor collection equipment that are compatible with the terminal's vapor collection system; and
- (c) limit marine tank vessel loading operations to those vessels that are vapor tight or meet the alternate compliance methods in 40 CFR 63.563(a)(4)(ii-iv) and to those vessels that are connected to the vapor collection system.

**SECTION D. Source Level Requirements****# 015 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.562]****Subpart Y - National Emission Standards for Marine Tank Vessel Tank Loading Operations Standards.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The written operation and maintenance plan for corrective action required or this source shall be adhered to.

(a) The plan shall:

- (1) identify all routine or otherwise predictable continuous monitoring system (thermocouples, pressure transducers, continuous emissions monitors (CEMS), etc.) variances;
- (2) specify preventive maintenance procedures to be followed to ensure that air pollution control equipment and monitoring equipment functions properly and variances of the control equipment and monitoring equipment are minimal;
- (3) identify all operating parameters to be monitored and recorded for the air pollution control device as indicators of proper operation and shall establish the frequency at which the parameters will be monitored (see 40 CFR § 63.564); and
- (4) incorporate a standardized inspection schedule for each component of the control device used to comply with the emissions standards in § 63.562(b), (c), and (d). To satisfy the requirements of this paragraph, the permittee may use the inspection schedule recommended by the vendor of the control system or any other technical publication regarding the operation of the control system.

(b) The permittee shall develop and implement a continuous monitoring system (CMS) quality control program. The permittee shall develop and submit to the Administrator for approval upon request a site-specific performance evaluation test plan for the CMS performance evaluation required in 40 CFR § 63.8(e). Each quality control program shall include, at a minimum, a written protocol that describes procedures for initial and any subsequent calibration of the CMS; determination and adjustment of the calibration drift of the CMS; preventive maintenance of the CMS, including spare parts inventory; data recording, calculations, and reporting; and accuracy audit procedures, including sampling and analysis methods. The permittee shall maintain records of the procedures that are part of the quality control program developed and implemented for CMS.

(c) The operation and maintenance plan shall be made available for inspection, upon request and shall be retained for the life of the source/control device. If the plan is revised, the permittee shall keep the superseded versions available for inspection for a period of five (5) years.

016 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.563]**Subpart Y - National Emission Standards for Marine Tank Vessel Tank Loading Operations Compliance and performance testing.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

Each valve that could possibly vent to the atmosphere shall be secured in the closed position during marine vessel loading operations using either a car-seal or a lock and key, except for pressure/vacuum relief, analyzers, instrumentation devices, sampling and venting for maintenance. All repairs to these closure mechanisms shall be made within fifteen (15) days after a change in the position of the valve or break in the closure mechanism is detected, but no later than prior to the next marine vessel loading operation, whichever is later.

017 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.563]**Subpart Y - National Emission Standards for Marine Tank Vessel Tank Loading Operations Compliance and performance testing.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

Loading may only be performed if the marine vessel's vapor collection equipment is compatible to the terminal's vapor collection system and when these two collections are properly connected and vented to the VCU.

018 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.563]**Subpart Y - National Emission Standards for Marine Tank Vessel Tank Loading Operations Compliance and performance testing.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]



SECTION D. Source Level Requirements

Marine vessels loaded shall meet the operating pressure requirements of 33 CFR § 154.814.

To ensure that the marine vessels are vapor tight, vessels determined to not meet the vapor tightness requirement in 40 CFR 63.563(a)(4)(i) may be loaded via any of the other three options specified in 40 CFR 63.563(a)(4)(ii-iv).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**SECTION D. Source Level Requirements**

Source ID: CD02

Source Name: VAPOR COLLECTION UNIT

Source Capacity/Throughput:

N/A

Natural Gas

I. RESTRICTIONS.**Emission Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Emissions from the VCU shall not exceed any of the following:

- (a) NO_x - 24.0 tpy and 4.34 mg/liter of product loaded;
- (b) CO - 48.0 tpy; and
- (c) VOC - 0.98 tpy (supplemental fuel consumption).

Fuel Restriction(s).**# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Only natural gas shall be used as supplemental fuel for this VCU.

Control Device Efficiency Restriction(s).**# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Total HAP emissions (measured as VOC) shall be reduced by a minimum of 99%.

[Compliance with this condition assures compliance with 40 CFR § 63.562(b)(3).]

004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.565]**Subpart Y - National Emission Standards for Marine Tank Vessel Tank Loading Operations****Test methods and procedures.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441 and 40 CFR § 63.563(b)(4).]

The permittee shall comply with one of the following:

- (a) the VCU shall be operated with a 3-hour block average outlet VOC concentration as determined in 40 CFR § 63.564(e)(1) that is no more than 20 percent above the baseline VOC concentration; or
- (b) the VCU shall be operated with the 3-hour block average temperature at the VCU at a minimum of 1452°F as determined in 40 CFR § 63.564(e)(2) or (3), which is no more than 28°C (50°F) below the baseline temperature established during the initial performance test.

II. TESTING REQUIREMENTS.**# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall perform a stack test using the Department-approved procedures once every five (5) calendar years, where five calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five years later. Performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department. When testing of a source is required on a recurring basis, a single procedural protocol may be submitted for approval; thereafter, a letter referencing the previously approved procedural protocol is sufficient. However, if modifications are made to the process(es), if a different stack testing company is used, or if an applicable section of the Source Test Manual has been revised since approval, a new protocol must be submitted for approval.

(b) At least ninety (90) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of

**SECTION D. Source Level Requirements**

representative samples.

(c) The stack test shall, at a minimum, test for NO_x emissions at the VCU (Control Device CD02) and percent reduction of HAP emissions (measured as VOC) from Marine Vessel Loading (Source ID 102). Tests shall be conducted in accordance with the provisions of the applicable EPA Test Method and/or other Department approved methodology and 25 Pa. Code Chapter 139, including the procedures of the most recent DEP Source Testing Manual.

(d) At least thirty (30) days prior to the test, the Regional Air Quality Manager shall be informed of the date and time of the test.

(e) Within sixty (60) days after the source test(s), one paper copy plus one electronic copy of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

III. MONITORING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the amount of supplemental natural gas usage for the VCU.

IV. RECORDKEEPING REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

On a monthly and a 12 consecutive month basis, the permittee shall record the following:

- (a) amount of crude oil loaded to marine vessels; and
- (b) amount of supplemental natural gas usage.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain a copy of the manufacturer's specifications for the VCU.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall keep records of VOC, NO_x, CO and HAP emissions (associated with the loading operations) on a monthly and 12 consecutive month basis. The emissions shall be calculated using the throughput of the crude oil loaded to marine vessels and supplemental natural gas usage for the VCU along with emission factors from the most recent stack test data. The stack test emission factors include the resulting emissions from both the destruction of marine vapors and the use of natural gas supplemental fuel.

The CO emissions will continue to be based on manufacturer provided information.

- (b) The permittee shall keep records of the VCU temperature in conjunction with the loading starting and ending period on a daily basis.
- (c) The permittee shall retain the monitoring logs of the daily inspections (during vessel loading).

V. REPORTING REQUIREMENTS.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded shall be stated in a semiannual report. The report must also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions in accordance with 40 CFR § 63.562(e), including actions taken to correct a malfunction. The

**SECTION D. Source Level Requirements**

report, to be certified by the permittee, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half (June 30 and December 30).

VI. WORK PRACTICE REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

At a minimum, the VCU shall be equipped with the following alarms and shutdown capabilities:

- (a) high stack temperature;
- (b) loss of flame at the burner;
- (c) high temperature at the vapor entrance to the stack;
- (d) high and low pressure in vapor piping;
- (e) back flow at flame arrestor; and
- (f) high and low pressure of fuel gas.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).



SECTION E. Source Group Restrictions.

No Source Groups exist for this permit.



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this permit.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description		
CD02	VAPOR COLLECTION UNIT		
Emission Limit		Pollutant	
48.000	Tons/Yr		CO
4.340	mg/L	of product loaded	NOX
24.000	Tons/Yr		NOX
0.980	Tons/Yr	supplemental fuel consumption	VOC

Site Emission Restriction Summary

Emission Limit		Pollutant	
24.000	Tons/Yr		VOC
24.000	Tons/Yr		NOX
9.900	Tons/Yr	Individual HAP	Hazardous Air Pollutants
24.900	Tons/Yr	Total HAPs	Hazardous Air Pollutants

**SECTION H. Miscellaneous.**-----
INITIAL PERMIT

Certain terms and conditions listed in this operating permit have been derived from the following previously issued permits:

- (1) GP2-23-0228, issued 12/26/2012 for Source ID 101 (Crude Oil Tank 1)
- (2) Plan Approval No. 23-0220, issued 07/03/2013 for Source ID 102 (Marine Vessel Loading) and Control Device CD02 (Vapor Collection Unit).

In June 2015, the Department approved the company's request to reduce the perimeter monitoring from daily to weekly. The corresponding condition is listed as Site Level (Section C) Condition #011.

AMENDMENT

March 2018 - APS: 960124, AUTH: 1215264 - This administrative amendment addresses a change of ownership from Eddystone Rail Company LLC (Tax ID 46-0972209) to Eddystone Marine & Rail Terminal Company (Tax ID 82-2066222).

RENEWAL PERMIT

June 2020 - AUTH ID 1288258. No new sources and no new state or federal regulations at this time.



***** End of Report *****
