Maryland
Department of
the Environment

Larry Hogan, Governor
Boyd Rutherford, Lt. Governor

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

AUG - 5 2021

Mr. Bernie Sheil, Compliance Manager
Center Point Terminal Baltimore, LLC
8235 Forsyth Blvd., Suite 400
Clayton MO 63105

Dear Mr. Sheil:

Re: Renewal Part 70/ Title V Operating Permit 24-510-0730

Enclosed, please find the renewal Part 70/Title V Operating Permit and Fact Sheet for the Center Point Terminal Baltimore, LLC located in Baltimore, Maryland. The permit will expire on May 31, 2026.

The Code of Maryland Regulations (COMAR) 26.11.03.11 states the following:

> If the Department denies a Part 70 permit or issues it with terms and conditions that are objectionable to the applicant, the applicant may request that a contested case hearing be held regarding the permit. This request shall be made to the Department in writing not later than 15 days after the applicant receives notice that the permit has been denied or of the objectionable terms and conditions. The request shall include the basis for the request and refer to any objectionable terms and conditions.

Please note the following revised condition in the Permit under Section II, General Conditions, Number 5, Permit Renewal:

> The Permittee shall submit to the Department a completed application for renewal of this Part 70 permit 12 months before the expiration of the permit. Upon submitting a complete application, the Permittee may continue to operate this facility pending final action by the Department on the renewal.

If you have any questions, please feel free to contact Ms. Sarah Wells, the permit manager for this facility, at sarah.wells@maryland.gov, or (410) 537-3230.

Sincerely,

Suna Yi Sariscak, Manager
Air Quality Permits Program
Air & Radiation Administration

SYS/jm

Enclosures

cc: EPA Region III (w/encl)

CENTER POINT TERMINAL BALTIMORE, LLC
3100 VERA STREET, BALTIMORE, MD 21226
PERMIT NO. 24-510-0730
PART 70 OPERATING PERMIT FACT SHEET

BACKGROUND

Center Point Terminal Baltimore is located at 3100 Vera Street, Baltimore City, which is in Maryland Air Quality Area III, an ozone non-attainment area. The primary standard industrial classification (SIC) code for this terminal is 5171.

This facility is a bulk gasoline terminal. The major activities at the facility include storage and distribution of petroleum products including gasoline, distillates, and other refined petroleum products (diesel fuel, kerosene, No. 2 fuel oil, and ethanol). Product is received by pipeline or by barge. The vapors collected at the loading rack are sent to the McGill Environmental Systems flare (a Vapor Control Unit; VCU). The flare is activated when the truck driver activates the card reader.

The primary sources of air pollution at the facility include gasoline storage tanks, ethanol storage tanks, and fuel oil, diesel fuel, and kerosene storage tanks, and a truck loading rack controlled by one (1) McGill Environmental Systems flare. Gasoline loading occurs at bay B and H, which includes equipment for the injection (blending) of fuel ethanol into gasoline.

Gasoline is stored in one (1) open top storage tank with an external floating roof (Tank No.11), and four (4) closed top storage tanks (Tank Nos. 7, 8, 9, and 10) with internal floating roofs. All floating roofs are equipped with primary and secondary seals. Tank 11 stores either gasoline or #2 fuel oil. In support of the terminal operations, Center Point Terminal Baltimore also maintains five (5) 29,600-gallon fixed-roof ethanol storage tanks (Tank No. 29-1, 29-2, 29-3, 29-4, and 29-5) and six (6) non-gasoline storage tanks (kerosene and fuel oils). Non–gasoline storage tanks include five (5) 6,341,000-gallon storage tanks each with a cone roof (Tank No. 1, 2, 3, 5, and 6) and one (1) 6,275,000-gallon storage tank with a cone roof (Tank No. 4).

The facility maintains files on trailer vapor certifications at the terminal. None of the tank trucks that load there is owned by the facility. To ensure that all trucks that load from the facility have valid vapor tightness certifications, the facility uses a computer system to verify current certification. This prevents trucks with expired certifications from loading.

The following table summarizes the actual emissions from Center Point Terminal Baltimore based on its Annual Emission Certification Reports:

Table 1: Actual Emissions

Year	NO_x (TPY)	SO_x (TPY)	PM_{10} (TPY)	CO (TPY)	VOC (TPY)	Total HAP (TPY)
2014	0.05	0	0	0.01	44.6	0.40
2015	0.04	0	0	0.01	46.8	0.39
2016	0.03	0	0	0.01	44.7	0.40
2017	0.05	0	0	0.01	47.3	0.43
2018	0.04	0	0	0.01	54.0	0.49

The major source threshold for triggering Title V permitting requirements in Baltimore City is 25 tons per year for VOC, 25 tons per year for NOx, and 100 tons per year for any other criteria pollutants and 10 tons per year for a single HAP or 25 tons per year for total HAPS. The facility was originally a minor source of VOC emissions, however, since the actual VOC emissions from the facility beginning in 2009 are greater than the major source threshold, Center Point Terminal Baltimore is required to obtain a Title V – Part 70 Operating Permit under COMAR 26.11.03.01.

The Department on May 23, 2019 received Center Point Terminal Baltimore's Title V – Part 70 Operating Permit renewal application. An administrative completeness review was conducted and the application was deemed administratively complete. An administrative completeness letter was sent on May 30, 2019 granting Center Point Terminal Baltimore an application shield.

APPLICABILITY OF FEDERAL REGULATIONS

NSPS Applicability

(1) NSPS Subparts K, Ka, or Kb:

(a) Although Tanks #1, 2, 3, 4, 5, and 6 have storage capacities greater than 40,000 gallons, they are used for fuel oil storage, all vapor pressures of fuel oils are less than 3.5 kilopascals (kPa);
(b) Although Tanks #7, 8, 9, 10, and 11 have storage capacities greater than 40,000 gallons and are used to store gasoline, they were installed prior to June 11, 1973, and facility have not undergone any major modification or reconstruction; and

(c) Although Tank #29-1, 29-2, 29-3, 29-4 and 29-5 have storage capacities of 29,600-gallons, they are used to store gasoline additive (ethanol), vapor pressures of fuel oils are less than 3.5 kilopascals (kPa).

Therefore, all above installations are not subject to **NSPS Subparts K, Ka, or Kb.**

(2) 40 CFR, Part 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals for which the construction or modifications commenced after December 17, 1980:

Since the loading rack was installed 1958 and has not undergone any major modification or reconstruction, it is not subject to 40 CFR, Part 60, Subpart XX.

NESHAP Applicability

(1) Major Source NESHAP Requirements of 40 CFR, Part 63, Subpart R for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)

Center Point Terminal Baltimore is not a major source for HAP thus it is not subject to this regulation.

(2) Area Source NESHAP requirements of 40 CFR, Part 63, Subpart BBBBBB for Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities

Center Point Terminal Baltimore is considered an existing source with respect to 40 CFR, Part 63, Subpart BBBBBB because the facility was constructed or reconstructed, as defined in 40 CFR, Part 63, prior to November 9, 2006. The compliance date for existing sources is January 10, 2011. Center Point Terminal Baltimore submitted an initial notification dated July 1, 2009 (received by the Department on 07/09/2006) to satisfy the initial notification requirements of 40 CFR 63.11086 or 63.11093 of Subpart BBBBBB. In lieu of a performance test, the initial notification certifies that the gasoline truck loading rack is in compliance with the provision of 63.11092(a)(2) by limiting organic emissions from the loading rack to 35 milligrams per liter of gasoline loaded.

CAM Applicability

Compliance Assurance Monitoring (CAM), as specified in 40 CFR, Part 64, applies to any emission unit at a Title V major source that meets all of the following criteria:

(1) The emission unit is subject to a federally enforceable emission limit or standard for a regulated pollutant.

(2) The emission unit uses a control device to achieve compliance with any such emission limitation or standard.

(3) The emission unit has the potential to emit pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source and must not otherwise be exempt from CAM.

The storage vessels at Center Point Terminal Baltimore do not employ control devices as defined in 40 CFR §64.1. CAM requirements do not apply to the storage vessels.

The loading rack at Center Point Terminal Baltimore uses a McGill Environmental Systems flare to meet federally enforceable emission limits (COMAR 26.11.13.04A(1)(a)). The VOC emissions from the loading rack, pre-control, would be greater than the major source threshold of 25 tons per year. The loading rack is not subject to major source MACT requirements and is not otherwise exempt from CAM. CAM requirements apply to the flare system and a CAM Plan for the flare system is included in the Part 70 Operating Permit.

GREENHOUSE GAS (GHG) EMISSIONS

GHGs of Center Point Terminal Baltimore originate from fuel burning (i.e., gas flaring) contained within the facility. The emission certifications reports for the years 2016, 2017, and 2018, showed that it was not a major source (threshold: 100,000tpy CO_2e) for GHG's (see Table 2 shown below). The facility has not triggered Prevention of Significant Deterioration (PSD) requirements for GHG emissions, but it is still required to quantify facility-wide GHGs emissions and report them in accordance with Section 3 of the Part 70 permit.

The following table summarizes the actual emissions from Center Point Terminal Baltimore based on its Annual Emission Certification Reports:

Table 2: Greenhouse Gases Emissions Summary

GHG	Conversion factor	2016 tpy CO_2e	2017 tpy CO_2e	2018 tpy CO_2e
Carbon dioxide CO_2	1	30	43	36
Methane CH_4	25	0	0	0
Nitrous Oxide N_2O	300	0	0	0
Total GHG CO_{2eq}		**30**	**43**	**36**

PERMITTING ACTIVITIES SINCE LAST ISSUANCE OF PART 70 PERMIT

Since last issuance of the Part 70 permit, the Department has issued permits to construct (PTCs) to the facility as follows:

(1) Modification of the existing gasoline storage tank #10 (EU-4) by converting existing external floating roof tank to an internal floating roof tank with an addition of a fixed roof (ARA registration No. 510-0730-9-0997). The permit to construct was issued on October 12, 2016.

(2) Modification of the existing gasoline storage tank #8 (EU-2) by the replacement of internal floating roof and seals (ARA registration No. 510-0730-9-0997). The permit to construct was issued on September 17, 2019.

EMISSION UNIT IDENTIFICATION

Center Point Terminal Baltimore has identified the following emission units as being subject to Title V permitting requirements and having applicable requirements:

Table 3: Emission Unit Identification

Emissions Unit Number	ARA Registration Number	Emissions Unit Name and Description	Date of Installation
EU-1	510-0730-9-0997	Tank #7: 2,818,000-gallon close top tank equipped with internal floating roof with primary and secondary seals (100 ft D x 48 ft H)	1960, converted to internal floating roof 2013
EU-2		Tank #8: 2,818,000-gallon close top tank equipped with internal floating roof with primary and secondary seals (100 ft D x 48 ft H)	1960, converted to internal floating roof 2014, replaced internal floating roof and seals 2019
EU-3		Tank #9: 2,818,000-gallon close top tank equipped with internal floating roof with primary and secondary seals (100 ft D x 48 ft H)	1960, converted to internal floating roof 2012
EU-4		Tank #10: 2,818,000-gallon close top tank equipped with internal floating roof with primary and secondary seals (100 ft D x 48 ft H)	1960, converted to internal floating roof 2016
EU-5		Tank #11: 10,654,000-gallon open top tank equipped with external floating roof with primary and secondary seals (180 ft D x 56 ft H)	1958
EU-9		One (1) truck loading rack equipped with one(1) McGill Environmental Systems Model EVC air-assisted flare	1958
EU-6	510-0730-9-1075	Tank #29-1: 29,600-gal fixed-roof above ground ethanol storage tank (12ft D x 35 ft H)	2006

Emissions Unit Number	ARA Registration Number	Emissions Unit Name and Description	Date of Installation
EU-7		Tank #29-2: 29,600-gal fixed-roof above ground ethanol storage tank (12ft D x 35 ft H)	2006
EU-8		Tank #29-3: 29,600-gal fixed-roof above ground ethanol storage tank (12ft D x 35 ft H)	2006
EU-10		Tank #29-4: 29,600-gal fixed-roof above ground ethanol storage tank (12ft D x 35 ft H)	2015
EU-11		Tank #29-5: 29,600-gal fixed-roof above ground ethanol storage tank (12ft D x 35 ft H)	2015

Note: Tanks #1 through #6 are used for fuel oil storage and are listed under Section V of Insignificant Activities.

AN OVERVIEW OF THE PART 70 PERMIT

The Fact Sheet is an informational document. If there are any discrepancies between the Fact Sheet and the Part 70 permit, the Part 70 permit is the enforceable document.

Section I of the Part 70 Permit contains a brief description of the facility and an inventory list of the emissions units for which applicable requirements are identified in Section IV of the permit.

Section II of the Part 70 Permit contains the general requirements that relate to administrative permit actions. This section includes the procedures for renewing, amending, reopening, and transferring permits, the relationship to permits to construct and approvals, and the general duty to provide information and to comply with all applicable requirements.

Section III of the Part 70 Permit contains the general requirements for testing, record keeping and reporting; and requirements that affect the facility as a whole, such as open burning, air pollution episodes, particulate matter from construction and demolition activities, asbestos provisions, ozone depleting substance provisions, general conformity, and acid rain permit. This section includes the requirement to report excess emissions and deviations, to submit an annual emissions certification report and an annual compliance certification report, and results of sampling and testing.

Section IV of the Part 70 Permit identifies the emissions standards, emissions limitations, operational limitations, and work practices applicable to each emissions unit located at the facility. For each standard, limitation, and work practice, the permit identifies the basis upon which the Permittee will demonstrate compliance. The basis will include testing, monitoring, record keeping, and reporting requirements. The demonstration may include one or more of these methods.

Section V of the Part 70 Permit contains a list of insignificant activities. These activities emit very small quantities of regulated air pollutants and do not require a permit to construct or registration with the Department. For insignificant activities that are subject to a requirement under the Clean Air Act, the requirement is listed under the activity.

Section VI of the Part 70 Permit contains State-only enforceable requirements. Section VI identifies requirements that are not based on the Clean Air Act, but solely on Maryland air pollution regulations. These requirements generally relate to the prevention of nuisances and implementation of Maryland's Air Toxics Program.

REGULATORY REVIEW/TECHNICAL REVIEW/COMPLIANCE METHODOLOGY

GASOLINE STORAGE TANKS – EMISSION UNITS EU-1 to EU-5

The following is a description of the storage tanks included in Emission Unit No. 1 to 5 (ARA Registration No. 510-0730-9-0997):

Tank #7: 2,818,000-gallon tank equipped with internal floating roof with primary and secondary seals.

Tank #8: 2,818,000-gallon tank equipped with internal floating roof with primary and secondary seals.

Tank #9: 2,818,000-gallon tank equipped with internal floating roof with primary and secondary seals.

Tank #10: 2,818,000-gallon tank equipped with internal floating roof with primary and secondary seals.

Tank #11: 10,654,000-gallon open top tank equipped with external floating roof with primary and secondary seals

These emission units are large (greater than 40,000 gallons) petroleum storage tanks with close top internal (Tank # 7, 8, 9 and 10) or open top external (Tank # 11) floating roofs equipped with either primary and secondary seals or a mechanical shoe seal. In addition to storing gasoline, these tanks are permitted to store distillate oils and other refined petroleum products (kerosene, diesel fuel, No. 2 fuel oil, or ethanol).

40 CFR, Part 60, Subpart K, Ka, and Kb Discussion

Tank #7, 8, 9, 10 and 11 were originally installed before 1960. The secondary seals were installed in 1981. These tanks are not subject to the requirements of 40 CFR, Part 60, Subpart K, Ka, or Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) because these tanks were not constructed, reconstructed, or modified after July 11, 1973. These gasoline storage tanks are subject to the requirements of:

(1) COMAR 26.11.13, Control of Gasoline and Volatile Organic Compound Storage and Handling; and

(2) The area source HAP requirements of 40 CFR 63, Subpart BBBBBB for gasoline storage tanks at bulk gasoline terminals.

Storage tanks #7, 8, 9 and 10 internal floating roof tanks (T5 permit- Table IV-1)

Applicable Requirements

Control of VOC and HAP

A. **COMAR 26.11.13.03A(1)(a) to (b)**, which require the Permittee to meet the following equipment requirements for large, close top storage tanks, with a capacity of 40,000 gallons or greater storing gasoline or VOC having a True Vapor Pressure (TVP) between 1.5 psia and 11 psia inclusive:

(1) The tank's gauging and sampling devices shall be gas tight except when in use.

(2) Each tank shall be equipped with one of the following properly installed, operating, and well maintained emission control systems **[Authority: COMAR 26.11.13.03A(1)(b)]**:

(a) An internal floating roof equipped with a primary and secondary seal,

(b) A pressure tank system that maintains a pressure at all times to prevent loss of vapors to the atmosphere, or

(c) A vapor control system capable of collecting the vapors from the tank and disposing of these vapors to prevent their emission to the atmosphere.

B. **COMAR 26.11.13.03A(2)** which requires the Permittee to meet the following seal requirements:

(1) There shall be no visible holes, tears, or other openings in the seal or seal fabric.

(2) Each seal shall be intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall.

(3) The accumulated area of the gaps between the secondary seal and the tank wall and between the seal and other obstructions inside the tank (that is, ladder, roof supports, gauging and sampling devices) that are greater than 1/8 inch in width may not exceed 1.0 square inch per foot of tank diameter.

C. **40 CFR 63, Subpart BBBBBB** which requires the Permittee to meet emission limits and management practices for gasoline storage tanks at bulk gasoline terminals.

The Permittee has elected to comply with 40 CFR 63, Subpart BBBBBB by equipping each tank with an internal floating roof meeting the following specifications:

(1) The internal floating roof shall be floating on the liquid surface (but not necessarily in complete contact with it) inside the storage vessel at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. **[Authority: 40 CFR §60.112b(a)(1)(i), §63.11087(a), and Table 1 to 40 CFR, Part 63, Subpart BBBBBB, requirement 2(b)]**
[Note: These requirements also satisfy the requirements of COMAR 26.11.13.03A(1)(b) and COMAR 26.11.13.03A(2).]

(2) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:

(a) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

(b) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.

(3) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
[Authority: 40 CFR §60.112b(a)(1), §63.11087(a) and (b) and Table 1, Option 2(b) of 40 CFR 63, Subpart BBBBBB]

Compliance Demonstration for Control of VOC and HAP
As previously mentioned, the Department received Center Point Terminal Baltimore initial notification for Subpart BBBBBB on July 6, 2009 and their Notification of Compliance Status Report on January 10, 2011 so that there are no Subpart BBBBBB requirements included in this permit pertaining to the Initial Notification or the Notification of Compliance Status.

Note: Facility was issued a Permit to Construct (PTC) on October 12, 2016 to convert Tank #10, an existing external floating roof tank to an internal floating with an addition of a fixed roof. Compliance of Tank 10 (converted to internal floating roof) with subpart BBBBBB was reported in the semiannual report received on January 27, 2017.

To comply with the requirements of COMAR 26.11.13.03A(1)(a), the Permittee shall perform annual visual inspections of each tank's gauging and sampling devices. If a failure of a gauging or sampling device is detected during a required visual inspection, the Permittee is required to repair the device or empty and remove the tank from service within 45 days. The Permittee shall maintain all records of the inspections and repairs, including the date and the action taken.

Each of the four (4) storage tanks is equipped with an internal floating roof with a primary and secondary seal to comply with the requirements of COMAR 26.11.13.03A(1)(b). To comply with the seal requirements of COMAR 26.11.13.03A(2) and 40 CFR, Part 63, Subpart BBBBBB, the Permittee is required to conduct visual inspections of the internal floating roof and seals of each tank prior to filling and refilling the tank with volatile organic liquid as specified in 40 CFR §60.113b(a)(1). The Permittee must also perform annual external visual inspections of the roof and seals of each tank in accordance with COMAR 26.11.13.03A(3) and 40 CFR §60.113b(a)(2) and repair any defects found or empty and remove the tank from service within 45 days. In addition, the Permittee must conduct an internal inspection of each tank at least every ten (10) years, as specified in 40 CFR §60.113b(a)(4) or when an annual visual inspection shows non-compliance. The Permittee shall determine the total seal gap during each internal inspection using the procedures in COMAR 26.11.13.03A(4). Any defects must be repaired prior to refilling the storage tank with volatile organic liquid. The Permittee is required to notify the Department prior to conducting internal inspections to afford the Department the opportunity to have an observer present as specified in 40 CFR §60.113b(a)(5) and COMAR 26.11.13.03A(3)(d).

In addition to maintaining inspection and repair records for each tank including all repairs or replacements of the seals as specified by COMAR 26.11.13.03C(2), the Permittee shall also maintain the average monthly storage temperature and throughput for each tank as specified in COMAR 26.11.13.03C(3). The Permittee is required to furnish a report to the Department within 30 days illustrating any defects in the tanks, including the seals and internal roofs, detected during the required inspections, as well as any repairs made, as required by 40 CFR §60.115b(a)(3) and (4).

The Permittee is required to submit a semiannual compliance report that includes records of each inspection performed on each of the four (4) storage tanks. The semiannual compliance report shall also include records of any defects in the tanks, including the seals and internal roofs, that are detected during the required inspections, as well as any repairs made as specified by §60.115b(a)(2), (3), and (4).

Rationale for Periodic Monitoring Strategy for Control of VOC and HAP
COMAR 26.11.13.03 and 40 CFR 63, Subpart BBBBBB outline the specific inspection methods and procedures for demonstrating compliance with the applicable roof and seal requirements for each storage tank. In addition, the Department requires annual inspections of each tank's gauging and sampling devices demonstrate compliance with the gas-tight device requirement. These inspections provide the appropriate amount of periodic monitoring required for compliance.

Storage tanks #11 external floating roof tank (T5 permit - Table IV -1a)

Applicable Standards/Limits:

A. Control of VOC

(1) **COMAR 26.11.13.03B(2)** which states that the Permittee shall not place or store gasoline or VOC having a true vapor pressure (TVP) of 1.5 psia (10.3 kilonewton/square meter) or greater in any open top tank with a capacity of 40,000 gallons (151,400 liters) or greater unless it is equipped with a properly installed and maintained external floating roof that meets all the following requirements:

(a) The external floating roof shall be equipped with a primary and secondary seal.

(b) Openings in the external floating roof, except for automatic bleeder vents, rim space vents, and leg sleeves, shall be equipped with a projection below the liquid surface. The opening with projections shall also be equipped with a cover, seal, or lid, which shall be maintained in a closed position at all times, except when the device is in actual use.

(c) Automatic bleeder vents shall be closed at all times except when the roof is resting on the roof supports. Rim vents shall be set to the open position when the roof is being floated off the leg supports or at the manufacturer's recommended setting.

(d) Roof drains shall be provided with a slotted membrane fabric or equivalent cover that encapsulates at least 90 percent of the area of the drain opening.

(2) **COMAR 26.11.13.03B(3)** which states that the Permittee shall meet the following seal requirements when storing gasoline or VOC having a true vapor pressure (TVP) of 1.5 psia (10.3 kilonewton/square meter) or greater in any open top tank with a capacity of 40,000 gallons (151,400 liters) or greater:

(a) There shall be no visible holes, tears, or other openings in a seal or seal fabric.

(b) Each seal shall be intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall.

(c) The accumulated area of the gaps between the secondary seal and the tank wall that are greater than 1/8 inch in width may not exceed 1.0 square inch per foot of tank diameter.

B. Control of HAP

40 CFR 63, Subpart BBBBBB which requires the Permittee to meet emission limits and management practices for gasoline storage tanks. At the first degassing and cleaning activity, or by January 10, 2018, whichever comes first.

The Permittee shall, by January 10, 2018, comply with 40 CFR 63, Subpart BBBBBB by equipping each external floating roof gasoline storage tank according to the requirements in §60.112b(a)(2) or alternately equip and operate each external floating roof gasoline storage tank according to the applicable requirements in §63.1063(a)(1)(ii) and (b).

Note: Compliance of Tank 11 (the only external floating roof tank) with the subpart was reported in the report received on July 31, 2017, following an API inspection on June 26, 2017. The tank is in compliance with the subpart and meet the compliance deadline of prior to 2018.

For complying with storage tank requirements in 40 CFR 63, Subpart BBBBBB using §60.112b(a)(2) the Permittee shall equip each tank with an external floating roof meeting the following specifications prior to storing gasoline in the tank:

(1) Each external floating roof shall be equipped with a closure device between the wall of the storage vessel and the roof edge. The closure device is to consist of two seals, one above the other. The lower seal is referred to as the primary seal, and the upper seal is referred to as the secondary seal.

(a) The primary seal shall be either a mechanical shoe seal or a liquid-mounted seal. Except as provided in 40 CFR §60.113b(b)(4), the seal shall completely cover the annular space between the edge of the floating roof and tank wall.

(b) The secondary seal shall completely cover the annular space between the external floating roof and the wall of the storage vessel in a continuous fashion except as allowed in §60.113b(b)(4).

[Authority: 40 CFR §60.112b(a)(2)(i), §63.11087(a), and Table 1 to 40 CFR 63, Subpart BBBBBB].

(2) If a tank does not meet the requirements of 40 CFR §60.112b(a)(2)(i):

(a) Except for automatic bleeder vents and rim space vents, each opening in a noncontact external floating roof shall provide a projection below the liquid surface.

(b) Except for automatic bleeder vents, rim space vents, roof drains, and leg sleeves, each opening in the roof is to be equipped with a gasketed cover, seal, or lid that is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use.

(c) Automatic bleeder vents are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

(d) Rim vents are to be set to open when the roof is being floated off the roof legs supports or at the manufacturer's recommended setting.

(e) Automatic bleeder vents and rim space vents are to be gasketed.

(f) Each emergency roof drain is to be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening.

[Authority: 40 CFR §60.112b(a)(2)(ii), §63.11087(a), and Table 1 to 40 CFR 63, Subpart BBBBBB].

(3) The roof shall be floating on the liquid at all times (i.e., off the roof leg supports) except during initial fill until the roof is lifted off leg supports and when the tank is completely emptied and subsequently refilled. The process of filling, emptying, or refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible. **[Authority: 40 CFR §60.112b(a)(2)(iii), §63.11087(a), and Table 1 to 40 CFR 63, Subpart BBBBBB].**

Compliance Demonstration for Control of HAP

The tank is equipped with an external floating roof with primary and secondary seal to meet the roof and seal requirements of COMAR 26.11.13.03 and 40 CFR 63, Subpart BBBBBB. For tank storing gasoline, the Permittee is required to conduct semiannual visual inspections of the tank's seals and measure gaps of the secondary seal annually and the primary seal every five years. The Permittee is also required to visually inspect the roof, seals, and fittings when the tank is emptied and degassed.

The Permittee must maintain records of inspections and measurements and any actions taken or repairs made to maintain compliance with all applicable requirements. The Permittee is required to notify the Department prior to conducting tank inspections and gap measurements and submit gap measurement and semiannual inspection reports.

The tank is permitted to store gasoline but currently store distillate oil. The Permittee shall comply with the Subpart BBBBBB requirements after the next degassing and cleaning activity or prior to January 10, 2018, whichever is first, and prior to storing gasoline as specified in 40 CFR §63.11087(b). The Permittee is required to submit a Notification of Compliance status with the semiannual report when the tank comes into compliance with 40 CFR 63, Subpart BBBBBB.

Rationale for Periodic Monitoring Strategy for Control of VOC and HAP
COMAR 26.11.13.03 and 40 CFR 63, Subpart BBBBBB outline the specific inspection and gap measurement methods and procedures for demonstrating compliance with the applicable roof and seal requirements for the storage tank. These inspections and gap measurements provide the appropriate amount of periodic monitoring required for compliance.

ETHANOL STORAGE TANKS – EMISSION UNITS EU-6, 7, 8, 10 and 11 (T5 permit - Table IV -2)

The following is a description of the storage tanks included in Emission Unit No. 6, 7, 8, 10, and 11 (ARA Registration No. 510-0730-9-1075):

EU-6: Tank No. 29-1 – 29,600-gal fixed-roof above ground ethanol storage tank (12ft D x 35 ft H).

EU-7: Tank No. 29-2 – 29,600-gal fixed-roof above ground ethanol storage tank (12ft D x 35 ft H).

EU-8: Tank No. 29-3– 29,600-gal fixed-roof above ground ethanol storage tank (12ft D x 35 ft H).

EU-10: Tank No. 29-4– 29,600-gal fixed-roof above ground ethanol storage tank (12ft D x 35 ft H).

EU-11: Tank No. 29-5– 29,600-gal fixed-roof above ground ethanol storage tank (12ft D x 35 ft H).

All five tanks were constructed after 2006. These tanks are used to store additive (ethanol) for gasoline. The tanks are sources of VOC emissions but are not subject to the VOC RACT requirements for VOC storage tanks in COMAR 26.11.13 because the vapor pressure of the additive does not meet the vapor pressure applicability threshold specified in COMAR 26.11.13. The tanks are subject to the general VOC requirements of COMAR 26.11.06.06.

Applicable Requirements

A. Control of VOC

COMAR 26.11.06.06B(1)(b) which requires that the Permittee limit emissions of VOC to not more than 20 pounds per day from installations constructed after May 12, 1972 unless VOC emissions are reduced by 85 percent or more overall. This requirement applies to all five tanks.

B. Operational Limitation

The Permittee shall store only ethanol that do not subject any of the storage tanks to the requirements of COMAR 26.11.13 and/or 40 CFR 60, Subpart Kb unless the Permittee obtains an approval from the Department. **[Authority: COMAR 26.11.02.09A]**

Compliance Demonstration and Rationale for Periodic Monitoring Strategy for Control of VOC and Operational Limitation

VOC emissions from Tank 29-1, 2, and 3 over the last four years average 4.5 pound per day per tank. This is below the 20 pounds per day VOC limit for each tank.

To continue to comply with the VOC emissions limitations of COMAR 26.11.06.06, the Permittee shall keep records and make them available to the Department upon request of the materials loaded into each tank. These records can be used to determine VOC emissions from each tank and are sufficient to demonstrate that each tank will not exceed its applicable VOC emissions limitation. In addition, the Permittee shall report incidences of excess emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations". No periodic monitoring is required to demonstrate compliance.

LOADING RACK FOR GASOLINE – EMISSION UNIT EU-9 (T5 permit Table IV -3)

Center Point Terminal Baltimore maintains a loading rack for loading petroleum products including gasoline (Bays B & H), distillates, and fuel ethanol controlled by a McGill/John Zink flare. Center Point Terminal Baltimore's loading rack is equipped with a bottom loading system to load gasoline, diesel fuel, No. 2 fuel oil, and/or fuel ethanol. Emissions from the loading rack include fugitive emissions from truck loading and emissions from the flare. The terminal does not own or operate any of the tank trucks transporting fuel from Center Point Terminal Baltimore to other facilities. All customers provide their own vehicles for fuel transport.

The original loading rack control device consisting of a burner was installed in 1958. The Company replaced the existing control device in 1992 with a McGill Environmental System Model air assisted flare to comply with COMAR 26.13.04A(1)(a) effective July 1, 1992. COMAR 26.11.13.04A(1)(a) requires the owner or operator of a bulk gasoline terminal to equip the loading system with a vapor control system designed to collect all vapors and control at least 90 percent of all vapors from the loading racks, and emissions from the loading rack may not exceed thirty-five milligrams VOC per liter of gasoline or VOC loaded in Areas III. The replacement was installed to comply with the requirements of COMAR 26.11.13.04 rather than for the throughput increase. There is no modification or reconstruction after December 17, 1980. Therefore, Center Point Terminal Baltimore loading rack is not subject to 40 CFR 60 Subpart XX. The loading rack is subject to VOC requirements in COMAR 26.11.13 for VOC loading operations and the area source HAP requirements of 40 CFR 63, Subpart BBBBBB for gasoline loading at bulk gasoline terminals.

Applicable Requirements

A. Visible Emissions Limitation

COMAR 26.11.06.02C(2), which prohibits visible emissions other than water in an uncombined form. This limitation applies to the vapor control unit (VCU) only.

Exceptions. **COMAR 26.11.06.02A(2)** establishes that COMAR 26.11.06.02C does not apply to emissions during start-up, and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) the visible emissions are not greater than 40 percent opacity; and (b) the visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period.

Compliance Demonstration for VE Limitation

The flare is the only equipment associated with the loading rack that is capable of causing visible emissions. The Permittee shall observe the stack of the flare for visible emissions at least once per week when the flare is operating. The observation shall be conducted as specified under Indicator No. 1 of the CAM Plan for the flare. The Permittee shall maintain records of the observations and shall report any excursions to the Department as specified under Indicator No. 1 of the CAM Plan for the flare.

Rationale for Periodic Monitoring Strategy for VE Limitation

Visible emissions from the flare are unlikely and would only occur if the unit is malfunctioning. A weekly visible emissions observation of the flare stack when the flare is operating is sufficient to demonstrate compliance with the no visible emission requirement.

B. Control of VOC and HAP (Vapor Collection and Control Requirements)

COMAR 26.11.13.04A(1)(a) and 40 CFR 63, Subpart BBBBBB which require vapor collection and control as follows:

(1) The loading rack shall be equipped with a vapor collection and control system designed to collect the total organic compound vapors displaced from cargo tanks during product loading.

(2) The vapor collection and control system shall control at least 90 percent of all vapors and emissions may not exceed 0.29 pounds of VOC per 1,000 gallons (35 milligrams of total organic compounds per liter) of gasoline or VOC loaded into gasoline cargo tanks at the loading rack.

[Authority: COMAR 26.11.13.04A(1)(a), 40 CFR §63.11088(a), §63.11092(d), Table 2, Items 1(a) and 1(b) of 40 CFR 63, Subpart BBBBBB]

Compliance Demonstration for Vapor Collection and Control Requirements

In order to keep premises wide HAP emissions below major source levels, the Permittee has elected to limit VOC emissions from the loading rack to less than 35 milligrams of VOC per liter of gasoline of VOC loaded as required by COMAR and the 80 milligrams per liter standard required by 40 CFR 63, Subpart BBBBBB.

To demonstrate compliance with the vapor collection and control requirements, the Permittee use a flare as the control device for the loading rack, the Permittee shall monitor the flare for the presence of a pilot flame and operate the flare in accordance with a monitoring and inspection plan specified in 40 CFR 63, Subpart BBBBBB. To ensure proper operation, the Permittee shall:

(1) have in operation a Terminal Management System which links trailer certification to customer information within a computer database. If the vapor tightness certification is not current, the driver is blocked from loading product.

(2) conduct weekly visual observation when flare is in operation with manual log entry of readings as CAM plan indicator 1 to fulfill the work practice requirement of 40 CFR 60.18 (f)(1) as specified in the CAM Plan.

(3) check temperature chart recording daily with manual log entry of verification of present of pilot flame when the flare is in operation as CAM plan indicator 2 to fulfill the work practice requirement of 40 CFR 60.18 (c)(2) as specified in the CAM Plan.

(4) check bypass valve to ensure no bypass of the flare is occurring as CAM plan indicator 3 at least once per month with manual log entry.

(5) conduct preventative maintenance on the flare as specified in the CAM Plan indicator 4.

To ensure proper operation of the loading rack, the Permittee shall utilize a Terminal Management System that ensures that vapor tightness certification is current by blocking drivers from loading product without proper certification using a computer chip database that links trailer certification to customer information. The Permittee is also required to keep records of all maintenance and repairs performed, including all replacements or additions of components on the flare system. The Permittee shall also maintain records of all mass emission rate and records of all preventative maintenance as required by the CAM Plan for the flare unit. These records shall be maintained on-site for at least five (5) years to ensure that the flare is maintained to perform as designed. The Permittee is to report all deviations from the CAM Plan for the flare to the Department.

Rationale for Periodic Monitoring Strategy for Vapor Collection and Control Requirements

COMAR 26.11.13 and 40 CFR 63, Subparts A and BBBBBB outline very specific compliance methods for the capture and control of VOC from gasoline cargo tank loading racks. The VCU is monitored through a required periodic monitoring and inspection plan and CAM Plan. Since the VCU is an open flare it cannot be stack tested to determine emissions. It was determined that the design of the flare is in compliance with the standards in 40 CFR 60.18 or 40 CFR 63.11. The air assisted flare is equipped with a thermocouple to sense the presence of a flame, as required by 40 CFR 60.18 (f) (2). The minimum heating value of the gas to be burned (1575 Btu/scf for gasoline vapors) is well above the minimum limit of 300 Btu/scf required by 40 CFR 60.18(c) (3) (ii). The exit velocity of 60 ft/s is also well below the maximum exit velocity limit of 165 ft/s required by 40 CFR 60.18 (f) (6) for gas with a heating value of 1574 btu/scf. The flare is designed to meet all applicable VOC control efficiency and emission limitation requirements. Proper preventative maintenance, visual observation, and monitoring the presence of pilot flame when flare is in operation will ensure that the unit is operated as designed.

C. Control of VOC and HAP (Vapor Tight Cargo Tank Requirements)

COMAR 26.11.13.05 and 40 CFR 63, Subpart BBBBBB which require the Permittee to load gasoline only into vapor tight gasoline cargo tanks that have been certified as capable of sustaining a pressure change of not more than 3 inches of water in 5 minutes when pressurized to a gauge pressure of 18 inches of water, or evacuated to a gauge pressure of 6 inches of water, during a test. **[Authority: COMAR 26.11.13.05A, 40 CFR §60.502(e), 40 CFR §63.11088(a), and Table 2, Item 1(d) of 40 CFR 63, Subpart BBBBBB]**

Compliance Demonstration for Vapor Tight Cargo Tank Requirements

To comply with the vapor tight cargo tank requirements of COMAR 26.11.13.05A, 40 CFR §60.502(e), 40 CFR §63.11088(a), and Table 2, Item 1(d) of 40 CFR 63, Subpart BBBBBB, the Permittee uses an alternate procedure as allowed under Subpart BBBBBB. The Permittee uses a terminal automation system to prevent gasoline or VOC cargo tanks that do not have valid cargo tank vapor tightness documentation from loading. The Permittee is required to keep all documentation from the terminal automation system as specified in Subpart BBBBBB and COMAR 26.11.13.05D(1)(a).

Rationale for Periodic Monitoring Strategy for Vapor Tight Cargo Tank Requirements

COMAR 26.11.13 and 40 CFR 63, Subpart BBBBBB outline the specific methods and procedures for demonstrating compliance with the vapor tight cargo tank requirements. No additional periodic monitoring is necessary to demonstrate compliance.

D. Control of VOC and HAP (Back Pressure and Leak Requirements)

COMAR 26.11.13.04A(1)(b) and 40 CFR 63, Subpart BBBBBB which require the Permittee design and operate the vapor collection and control system and the loading equipment so that during loading:

(1) The gauge pressure in the delivery tank does not exceed 4,500 pascals.

(2) No pressure-vacuum vent in the vapor collection and control system begins to open at a system pressure less than 4,500 pascals.

(3) The gasoline or VOC cargo tank pressure does not exceed 18 inches of water, and vacuum does not exceed 6 inches of water.

(4) There are no gasoline or VOC leaks in the system during loading or unloading operations.

[Authority: COMAR 26.11.13.04A(1)(b), 40 CFR §60.502(h), (i), and (j), 40 CFR §63.11088(a), and Table 2, Item 1(d) of 40 CFR 63, Subpart BBBBBB]

Compliance Demonstration for Back Pressure and Leak Requirements

The Permittee is required to conduct monthly leak inspections of the vapor collection system, the vapor processing system, and the loading rack when loading cargo tanks. This inspection is in addition to the facility wide leak inspections required by 40 CFR 63, Subpart BBBBBB. The Permittee is also required to conduct monthly back pressure checks. Records of leak inspections and back pressure checks must be maintained and any excursion reported as part of the semiannual compliance and excess emissions reports required by 40 CFR 63, Subpart BBBBBB.

Rationale for Periodic Monitoring Strategy for Back Pressure and Leak Requirements

The loading rack, and VCU are all are designed to be leak tight during loading and to meet applicable back pressure requirements. Monthly back pressure and leak checks during loading are sufficient to demonstrate compliance with the requirements.

E. Control of VOC and HAP (Design and Operational Requirements)
COMAR 26.11.13.04A(1)(c) and 40 CFR 63, Subpart BBBBBB which specify the following design and operational requirements:

(1) The Permittee shall design and operate the vapor collection system to prevent any total organic compound vapors collected at one loading lane from passing through another loading lane to the atmosphere.

(2) The Permittee shall assure that loadings of gasoline or VOC cargo tanks are made only into tanks equipped with vapor collection equipment that is compatible with the facility's vapor collection system.

(3) The Permittee shall assure that the facility's and the cargo tank's vapor collection systems are connected during each loading of a gasoline or VOC cargo tank.

(4) The Permittee shall equip the facility's loading rack with a top submerged or bottom loading system.

(5) The exhaust gases from the loading rack shall vent through the VCU prior to discharging to the atmosphere.

[Authority: COMAR 26.11.13.04A(1)(c), 40 CFR §60.502(f) and (g), 40 CFR §63.11088(a), Table 2, Items 1(c) and 1(d) of 40 CFR 63, Subpart BBBBBB]

Compliance Demonstration and Rationale for Periodic Monitoring Strategy for Design and Operational Requirements
The loading rack and vapor collection and control systems are designed to operate as required by COMAR 26.11.13.04A(1)(c), 40 CFR §60.502(f) and (g), and 40 CFR 63, Subpart BBBBBB. Periodic monitoring is not required to demonstrate compliance.

CAM Plan Requirements

The loading rack at Center Point Terminal Baltimore uses a McGill Environmental Systems Model EVC air-assisted flare to meet the applicable federally enforceable emission limits (COMAR 26.11.13.04A(1)(a)). The VOC emissions from the loading rack, pre-control, would be greater than the major source threshold of 25 tons per year. The loading rack is not subject to major source MACT requirements and is not otherwise exempt from CAM. A CAM plan is required for the VCU and is included in Table IV-4 CAM PLAN of the renewal Title V – Part 70 Operating Permit.

The performance indicators were selected to ensure a reasonable level of assurance that the VOC emissions from the loading of gasoline and other petroleum products at the truck loading rack will comply with the emissions limitations of 35 mg/liter of gasoline loaded. During the compliance tests to demonstrate compliance with the VOC emissions limits, the vapor collection system is checked for leaks and back pressure. The Permittee performs preventative maintenance as recommended by the vendor on the flare and routine maintenance of the vapor collection system to ensure that the flare and the vapor collection system continue to perform as designed.

The key factors considered in the CAM Plan to assure that compliance with the mass emissions limitations for the loading operations are as follows:

(1) McGill Environmental Systems Model EVC air-assisted flare is operating properly with no visible emissions.

(2) Operate Flare with pilot flame present at all times when flare is in operation.

(3) Ensure no bypass of the flare is occurring.

(4) The flare is under proper preventative maintenance program so that the unit continues to operate as designed.

Rationale for Selection of Performance Indicators in the CAM Plan

(1) Indicator No. 1 – Flare operated properly with no visible emissions
The Permittee shall conduct weekly visual readings when flare is in operation with manual log entry of readings. If the visible emissions are observed and documented, the Permittee shall investigate the unit's operation to correct and determine if maintenance or repair is needed to prevent possible non-compliance. All excursions will be reported to the ARA in the semi-annual monitoring reports.

(2) Indicator No. 2 - Operate Flare with pilot flame present at all times.
Daily check of temperature chart recording with manual log entry of verification of present of pilot flame will ensure operator did check the presence of pilot flame at least once per day. The presence of pilot flame will ignite the VOC vapors instantly once the flare starts operation.

(3) Indicator No. 3 - Ensure no bypass of the flare is occurring
The Permittee shall inspect of the bypass valve and seals monthly. Results of inspection are manually recorded and maintained on site. An excursion occurs if the bypass valve is not closed or sealed completely. An excursion will trigger an investigation, corrective action, and a reporting requirement.

(4) Indicator No. 4 - Preventative Maintenance
Preventative maintenance is performed four (4) times a year by a trained personnel or service person using a preventative maintenance checklist that is based on recommendations provided by the flare manufacturer. The service persons are trained on inspection and maintenance procedures. The units are checked during each inspection to ensure that all systems are working properly and to perform any scheduled preventative maintenance based on recommendations provided by the flare manufacturer. The Permittee documents these events through manual log entries. Preventative maintenance will ensure that the control devices will continue to operate as designed and remains in good condition.

The following tables contain the CAM Plan for the McGill Environmental Systems flare that is included in Table IV-4 of the Title V – Part 70 Operating permit.

Table 4 CAM PLAN
For McGill Environmental Systems Model EVC air-assisted flare

Part 64 Requirement	**CAM Plan Indicator No. 1**
I. Indicator 64.4(a)(1)	Operate flare with no visible emissions.
Monitoring Approach	A visible emission observation is made of the exhaust gases at the outlet of the flare during the loading of a gasoline tank truck
II. Indicator Range 64.4(a)(2)	No visible emissions. An excursion occurs if the visible emissions are observed. An excursion will trigger an investigation, corrective action, and a reporting requirement.
Reporting Threshold	All excursions will be reported to the ARA in the semi-annual monitoring reports.

Part 64 Requirement	CAM Plan Indicator No. 1
III. Performance Criteria 64.4(a)(3)	
A. Data Representatives	Observations made by trained personnel
B. Verification of Operational Status	Visible emission observation with manual log entry.
C. QA/QC Practices and Criteria	The observers are trained on procedures in making an observation and the record keeping requirements.
D. Monitoring Frequency	At least once per week when the gasoline tank truck is loading.
E. Data Collection	Results of observations will be manually recorded and maintained on site. Records will include date, time, and result of observation or reason.
F. Averaging Period	None.

Part 64 Requirement	CAM Plan Indicator No. 2
I. Indicator 64.4(a)(1)	Operate flare with pilot flame present at all times.
Monitoring Approach	Monitor temperature of pilot flame.
II. Indicator Range 64.4(a)(2)	Presence of flame. An excursion occurs if the pilot flame temperature is out of normal operation range or pilot flame is not present. An excursion will trigger an investigation, corrective action, and a reporting requirement.
Reporting Threshold	All excursions and corrective actions taken shall be reported to the ARA in the semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representatives	Temperature recorded automatically on chart paper.
B. Verification of Operational Status	Daily check of temperature chart recording with manual log entry of verification of present of pilot flame.

Part 64 Requirement	CAM Plan Indicator No. 2
C. QA/QC Practices and Criteria	Calibration, maintenance and operation of thermocouple according to manufacturer's specification.
D. Monitoring Frequency	Continuous
E. Data Collection	Automatic record the temperature of the flare when it is operating with records maintained on site.
F. Averaging Period	None.

Part 64 Requirement	CAM Plan Indicator No. 3
I. Indicator 64.4(a)(1)	Ensure no bypass of the flare is occurring.
Monitoring Approach	Inspect bypass valve seals.
IV. Indicator Range 64.4(a)(2) Reporting Threshold	Closed valve An excursion occurs if the bypass valve is not closed or sealed completely. An excursion will trigger an investigation, corrective action, and a reporting requirement. All excursions and corrective actions taken shall be reported to the ARA in the semi-annual monitoring reports.
V. Performance Criteria 64.4(a)(3)	
A. Data Representatives	Inspections made by trained personnel.
B. Verification of Operational Status	Not Applicable.
C. QA/QC Practices and Criteria	None
D. Monitoring Frequency	At least once per month.
E. Data Collection	Results of inspection are manually recorded and maintained on site.
F. Averaging Period	None.

Part 64 Requirement	CAM Plan Indicator No. 4
I. Indicator 64.4(a)(1)	Documentation of preventative maintenance.
Monitoring Approach	Proper flare operation is verified by performing preventative maintenance

Part 64 Requirement	CAM Plan Indicator No. 4
	as recommended by the FLARE manufacturer four (4) times a year.
II. Indicator Range 64.4(a)(2)	An excursion occurs if the preventative maintenance is not performed or documented.
Reporting Threshold	All excursions will be reported to the ARA in the semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representatives	flare operation verified by trained personnel or service person using a preventative maintenance checklist that is based on recommendations provided by the flare manufacturer.
B. Verification of Operational Status	Not applicable.
C. QA/QC Practices and Criteria	Service persons are trained on inspection and maintenance procedures.
D. Monitoring Frequency	Preventative maintenance will be performed four (4) times during a calendar year.
E. Data Collection	Results of inspection and maintenance performed during preventative maintenance are manually recorded and maintained on site.
F. Averaging Period	None.

GENERAL FACILITY WIDE REQUIREMENTS (T5 permit Table IV -4)

The Permittee is also subject to facility wide operation and maintenance requirements and leak inspection requirements under 40 CFR, Part 63, Subpart BBBBBB for all equipment in gasoline service.

A. Operational and Emissions Limitations to Preclude Applicability of Major Source HAP Requirements

Premises wide HAP emissions shall be less than the following limits in any rolling 12-month period:

(1) 10 tons for any individual HAP; and

(2) 25 tons for the total combination of HAP.

Compliance Demonstration for Operational and Emissions Limitations to Preclude Applicability of Major Source HAP Requirements

The Permittee shall maintain records of premises wide individual and total HAP emissions and gasoline, additives, and distillate throughput. The records shall be submitted to the Department with the Permittee's annual emission certification report.

The Permittee shall, at least once per year, test or have the fuel supplier test all fuels for HAP content including individual HAP speciation amounts. In lieu of the annual testing requirement, the Permittee may demonstrate compliance with the facility wide HAP emissions limitations through the use of HAP content documentation and/or test data provided by the American Petroleum Institute, the U.S. EPA, or other sources approved by the Department. The Permittee shall maintain records to support the calculation of HAP emissions including HAP content documentation and/or test data for each consecutive twelve (12) month period. The Permittee shall submit these records as part of the Annual Emissions Certification that is submitted to the Department each calendar year.

Rationale for Periodic Monitoring Strategy for Control of HAP

Records of HAP emissions and gasoline and distillate throughput submitted annually are sufficient to demonstrate compliance with the HAP emissions limits.

B. Control of HAP

40 CFR 63, Subpart BBBBBB, which requires general emission minimization procedures and premises wide leak inspections for control of HAP emissions from bulk gasoline terminals.

Compliance Demonstration for Control of HAP

The Permittee must operate and maintain the facility in a manner that minimizes emissions and conduct monthly leak inspections of all equipment in gasoline service.

The Permittee must keep records demonstrating that the facility is operated and maintained properly and leak inspection logs to document the results of each monthly leak inspection. The Permittee must also include these records in a semiannual report as specified in 40 CFR 63, Subpart BBBBBB.

Rationale for Periodic Monitoring Strategy for Control of HAP
40 CFR 63, Subpart BBBBBB outlines the specific procedures, and record keeping and reporting requirements that demonstrate continuous compliance with the subpart. No additional periodic monitoring is required.

COMPLIANCE SCHEDULE

Center Point Terminal Baltimore is currently in compliance with all applicable air quality regulations.

TITLE IV – ACID RAIN

Not Applicable

TITLE VI – OZONE DEPLETING SUBSTANCES

Center Point Terminal Baltimore is not subject to Title VI requirements.

SECTION 112(r) – ACCIDENTAL RELEASE

Center Point Terminal Baltimore is not subject to the requirements of Section 112(r).

PERMIT SHIELD

The Center Point Terminal Baltimore facility requested that a permit shield be expressly included in the Permittee's Part 70 permit. Permit shields are granted on an emission unit by emission unit basis. If an emission unit is covered by a permit shield, a permit shield statement will follow the emission unit table in Section IV - Plant Specific Conditions of the permit. In this case, a permit shield was granted for each emission unit covered by the permit.

INSIGNIFICANT ACTIVITIES

This section provides a list of insignificant emissions units that were reported in the Title V permit application. The applicable Clean Air Act requirements, if any, are listed below the insignificant activity.

(1) Containers, reservoirs, or tanks used exclusively for:

(a) ✓ Storage of butane, propane, or liquefied petroleum, or natural gas;

(b) No. 6 Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel;

Tank #1: 6,341,000-gallon with a cone roof

Tank #2: 6,341,000-gallon with a cone roof

Tank #3: 6,341,000-gallon with a cone roof

Tank #4: 6,275,000-gallon with a cone roof

Tank #5: 3,410,000-gallon with a cone roof

Tank #6: 3,410,000-gallon with a cone roof

(i) VOC emissions from the installations listed in this category are subject to COMAR 26.11.06.06B(1)(a) when storing Number 1 fuel oil, Number 2 fuel oil or aviation jet engine fuel. COMAR 26.11.06.06B(1)(a) requires that the Permittee limit emissions of VOC to not more than 200 pounds per day from installations constructed before May 12, 1972 unless VOC emissions are reduced by 85 percent or more overall.

(ii) The Permittee shall keep records and make them available to the Department upon request of the amounts, types, and composition of all materials loaded into each tank.

(2) and any other emissions unit, not listed in this section, with a potential to emit less than the "de minimus" levels listed in COMAR 26.11.02.10X (list and describe units):

No. 1 500 gallon horizontal storage tank for diesel red dye additive

No. 1 2,350 gal horizontal storage tank for diesel lubricity additive

No. 1 6,000 gal horizontal storage tank for gasoline additive

STATE ONLY ENFORCEABLE REQUIREMENTS

This section of the permit contain state-only enforceable requirements. The requirements in this section will not be enforced by the U.S. Environmental Protection Agency. The requirements in this section are not subject to COMAR 26.11.03 10 - Public Petitions for Review to EPA Regarding Part 70 Permits.

The Permittee is subject to the following State-only enforceable requirements:

1. Applicable Regulations:

   (a) COMAR 26.11.06.08 and 26.11.06.09, which generally prohibit the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created.

   (b) COMAR 26.11.15.05, which requires that the Permittee implement "Best Available Control Technology for Toxics" (T – BACT) to control emissions of toxic air pollutants.

   (c) COMAR 26.11.15.06, which prohibits the discharge of toxic air pollutants to the extent that such emissions will unreasonably endanger human health

2. Record Keeping and Reporting:

   The Permittee shall submit to the Department, by April 1 of each year during the term of this permit, a written certification of the results of an analysis of emissions of toxic air pollutants from the Permittee's facility during the previous calendar year. The analysis shall include either:

   (a) a statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid; or

   (b) a revised compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15 & 16, that accounts for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.

KEEP PERMIT AT SITE

CONTROL NO. B - 06698

State of Maryland

Larry Hogan
Governor

Ben Grumbles
Secretary

DEPARTMENT OF THE ENVIRONMENT

Air and Radiation Administration
1800 Washington Boulevard, Suite 720
Baltimore, MD 21230

[ ] Construction Permit

[X] Part 70 Operating Permit

PERMIT NO. 24-510-0730

DATE ISSUED August 5, 2021

PERMIT FEE To Be Paid in Accordance With COMAR 26.11.02.19B

EXPIRATION DATE May 31, 2026

LEGAL OWNER & ADDRESS

Center Point Terminal Baltimore, LLC
8235 Forsyth Blvd., Suite 400
Clayton, MO 63105
Attn: Mr. Bernie Sheil, Compliance Manager

SITE

Center Point Terminal Baltimore, LLC
3100 Vera St.
Baltimore, MD 21226
AI #2900

SOURCE DESCRIPTION

Gasoline Terminal with loading rack control.

This source is subject to the conditions described on the attached pages.

Program Manager

Director, Air and Radiation Administration

CENTER POINT TERMINAL BALTIMORE, LLC
3100 VERA STREET, BALTIMORE, MD 21226
PART 70 OPERATING PERMIT NO. 24-510-0730

SECTION I SOURCE IDENTIFICATION

1. DESCRIPTION OF FACILITY

Center Point Terminal Baltimore is located at 3100 Vera Street, Baltimore City, which is in Maryland Air Quality Area III, an ozone non-attainment area. The primary standard industrial classification (SIC) code for this terminal is 5171.

This facility is a bulk gasoline terminal. The major activities at the facility include storage and distribution of petroleum products including gasoline, distillates, and other refined petroleum products (diesel fuel, kerosene, No. 2 fuel oil, and ethanol). Product is received by pipeline or by barge. The vapors collected at the loading rack are sent to the McGill Environmental Systems flare (a Vapor Control Unit; VCU). The flare is activated when the truck driver activates the card reader.

The primary sources of air pollution at the facility include gasoline storage tanks, ethanol storage tanks, and fuel oil, diesel fuel, and kerosene storage tanks, and a truck loading rack controlled by one (1) McGill Environmental Systems flare. Gasoline loading occurs at bay B and H, which includes equipment for the injection (blending) of fuel ethanol into gasoline.

Gasoline is stored in one (1) open top storage tank with an external floating roof (Tank No.11), and four (4) close top storage tanks (Tank Nos. 7, 8, 9, and 10) with internal floating roofs. All floating roofs are equipped with primary and secondary seals. Tank 11 stores either gasoline or #2 fuel oil. In support of the terminal operations, Center Point Terminal Baltimore also maintains five (5) 29,600-gallon fixed-roof ethanol storage tanks (Tank No. 29-1, 29-2, 29-3, 29-4, and 29-5) and six (6) non-gasoline storage tanks (kerosene and fuel oils). Non–gasoline storage tanks include five (5) 6,341,000-gallon storage tanks each with a cone roof (Tank No. 1, 2, 3, 5, and 6) and one (1) 6,275,000-gallon storage tank with a cone roof (Tank No. 4).

The facility maintains files on trailer vapor certifications at the terminal. None of the tank trucks that load there is owned by the facility. To ensure that all trucks that load from the facility have valid vapor tightness certifications, the facility uses a computer system to verify current certification. This prevents trucks with expired certifications from loading.

2. FACILITY INVENTORY LIST

Emissions Unit Number	ARA Registration Number	Emissions Unit Name and Description	Date of Installation
EU-1	510-0730-9-0997	Tank #7: 2,818,000-gallon close top tank equipped with internal floating roof with primary and secondary seals (100 ft D x 48 ft H)	1960, converted to internal floating roof 2013
EU-2		Tank #8: 2,818,000-gallon close top tank equipped with internal floating roof with primary and secondary seals (100 ft D x 48 ft H)	1960, converted to internal floating roof 2014, replaced internal floating roof and seals 2019
EU-3		Tank #9: 2,818,000-gallon close top tank equipped with internal floating roof with primary and secondary seals (100 ft D x 48 ft H)	1960, converted to internal floating roof 2012
EU-4		Tank #10: 2,818,000-gallon close top tank equipped with internal floating roof with primary and secondary seals (100 ft D x 48 ft H)	1960, converted to internal floating roof 2016
EU-5		Tank #11: 10,654,000-gallon open top tank equipped with external floating roof with primary and secondary seals (180 ft D x 56 ft H)	1958
EU-9		One (1) truck loading rack equipped with one(1) McGill Environmental Systems Model EVC air-assisted flare	1958
EU-6	510-0730-9-1075	Tank #29-1: 29,600-gal fixed-roof above ground ethanol storage tank (12ft D x 35 ft H)	2006
EU-7		Tank #29-2: 29,600-gal fixed-roof above ground ethanol storage tank (12ft D x 35 ft H)	2006
EU-8		Tank #29-3: 29,600-gal fixed-roof above ground ethanol storage tank (12ft D x 35 ft H)	2006
EU-10		Tank #29-4: 29,600-gal fixed-roof above ground ethanol storage tank (12ft D x 35 ft H)	2015
EU-11		Tank #29-5: 29,600-gal fixed-roof above ground ethanol storage tank (12ft D x 35 ft H)	2015

Note: Tanks #1 through #6 are used for fuel oil storage and are listed under Section V of Insignificant Activities.

SECTION II GENERAL CONDITIONS

1. DEFINITIONS

[COMAR 26.11.01.01] and [COMAR 26.11.02.01]

The words or terms in this Part 70 permit shall have the meanings established under COMAR 26.11.01 and .02 unless otherwise stated in this permit.

2. ACRONYMS

ARA	Air and Radiation Administration
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEM	Continuous Emissions Monitor
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COMAR	Code of Maryland Regulations
EPA	United States Environmental Protection Agency
FR	Federal Register
gr	grains
HAP	Hazardous Air Pollutant
MACT	Maximum Achievable Control Technology
MDE	Maryland Department of the Environment
MVAC	Motor Vehicle Air Conditioner
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
NSR	New Source Review
OTR	Ozone Transport Region
PM	Particulate Matter
PM10	Particulate Matter with Nominal Aerodynamic Diameter of 10 micrometers or less
ppm	parts per million
ppb	parts per billion
PSD	Prevention of Significant Deterioration
PTC	Permit to construct
PTO	Permit to operate (State)
SIC	Standard Industrial Classification
SO_2	Sulfur Dioxide
TAP	Toxic Air Pollutant

tpy	tons per year
VE	Visible Emissions
VOC	Volatile Organic Compounds

3. EFFECTIVE DATE

The effective date of the conditions in this Part 70 permit is the date of permit issuance, unless otherwise stated in the permit.

4. PERMIT EXPIRATION

[COMAR 26.11.03.13B(2)]

Upon expiration of this permit, the terms of the permit will automatically continue to remain in effect until a new Part 70 permit is issued for this facility provided that the Permittee has submitted a timely and complete application and has paid applicable fees under COMAR 26.11.02.16.

Otherwise, upon expiration of this permit the right of the Permittee to operate this facility is terminated.

5. PERMIT RENEWAL

[COMAR 26.11.03.02B(3)] and [COMAR 26.11.03.02E]

The Permittee shall submit to the Department a completed application for renewal of this Part 70 permit at least 12 months before the expiration of the permit. Upon submitting a completed application, the Permittee may continue to operate this facility pending final action by the Department on the renewal.

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall submit such supplementary facts or corrected information no later than 10 days after becoming aware that this occurred. The Permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after the date a completed application was submitted, but prior to the release of a draft permit. This information shall be submitted to the Department no later than 20 days after a new requirement has been adopted.

6. CONFIDENTIAL INFORMATION

[COMAR 26.11.02.02G]

In accordance with the provisions of the State Government Article, Sec. 10-611 et seq., Annotated Code of Maryland, all information submitted in an application shall be considered part of the public record and available for inspection and copying, unless the Permittee claims that the information is confidential when it is submitted to the Department. At the time of the request for inspection or copying, the Department will make a determination with regard to the confidentiality of the information. The Permittee, when requesting confidentiality, shall identify the information in a manner specified by the Department and, when requested by the Department, promptly provide specific reasons supporting the claim of confidentiality. Information submitted to the Department without a request that the information be deemed confidential may be made available to the public. Subject to approval of the Department, the Permittee may provide a summary of confidential information that is suitable for public review. The content of this Part 70 permit is not subject to confidential treatment.

7. PERMIT ACTIONS

[COMAR 26.11.03.06E(3)] and [COMAR 26.11.03.20(A)]

This Part 70 permit may be revoked or reopened and revised for cause. The filing of an application by the Permittee for a permit revision or renewal; or a notification of termination, planned changes or anticipated noncompliance by the facility, does not stay a term or condition of this permit.

The Department shall reopen and revise, or revoke the Permittee's Part 70 permit under the following circumstances:

a. Additional requirements of the Clean Air Act become applicable to this facility and the remaining permit term is 3 years or more;

b. The Department or the EPA determines that this Part 70 permit contains a material mistake, or is based on false or inaccurate information supplied by or on behalf of the Permittee;

c. The Department or the EPA determines that this Part 70 permit must be revised or revoked to assure compliance with applicable requirements of the Clean Air Act; or

d. Additional requirements become applicable to an affected source under the Federal Acid Rain Program.

8. PERMIT AVAILABILITY

[COMAR 26.11.02.13G]

The Permittee shall maintain this Part 70 permit in the vicinity of the facility for which it was issued, unless it is not practical to do so, and make this permit immediately available to officials of the Department upon request.

9. REOPENING THE PART 70 PERMIT FOR CAUSE BY THE EPA

[COMAR 26.11.03.20B]

The EPA may terminate, modify, or revoke and reissue a permit for cause as prescribed in 40 CFR §70.7(g)

10. TRANSFER OF PERMIT

[COMAR 26.11.02.02E]

The Permittee shall not transfer this Part 70 permit except as provided in COMAR 26.11.03.15.

11. REVISION OF PART 70 PERMITS – GENERAL CONDITIONS

[COMAR 26.11.03.14] and [COMAR 26.11.03.06A(8)]

a. The Permittee shall submit an application to the Department to revise this Part 70 permit when required under COMAR 26.11.03.15 -.17.

b. When applying for a revision to a Part 70 permit, the Permittee shall comply with the requirements of COMAR 26.11.03.02 and .03 except that the application for a revision need include only information listed that is related to the proposed change to the source and revision to the permit. This information shall be sufficient to evaluate the proposed change and to determine whether it will comply with all applicable requirements of the Clean Air Act.

c. The Permittee may not change any provision of a compliance plan or schedule in a Part 70 permit as an administrative permit amendment or as a minor permit modification unless the change has been approved by the Department in writing.

d. A permit revision is not required for a change that is provided for in this permit relating to approved economic incentives, marketable permits, emissions trading, and other similar programs.

12. SIGNIFICANT PART 70 OPERATING PERMIT MODIFICATIONS

[COMAR 26.11.03.17]

The Permittee may apply to the Department to make a significant modification to its Part 70 Permit as provided in COMAR 26.11.03.17 and in accordance with the following conditions:

a. A significant modification is a revision to the federally enforceable provisions in the permit that does not qualify as an administrative permit amendment under COMAR 26.11.03.15 or a minor permit modification as defined under COMAR 26.11.03.16.

b. This permit does not preclude the Permittee from making changes, consistent with the provisions of COMAR 26.11.03, that would make the permit or particular terms and conditions of the permit irrelevant, such as by shutting down or reducing the level of operation of a source or of an emissions unit within the source. Air pollution control equipment shall not be shut down or its level of operation reduced if doing so would violate any term of this permit.

c. Significant permit modifications are subject to all requirements of COMAR 26.11.03 as they apply to permit issuance and renewal, including the requirements for applications, public participation, and review by affected states and EPA, except:

(1) An application need include only information pertaining to the proposed change to the source and modification of this permit, including a description of the change and modification, and any new applicable requirements of the Clean Air Act that will apply if the change occurs;

(2) Public participation, and review by affected states and EPA, is limited to only the application and those federally enforceable terms and conditions of the Part 70 permit that are affected by the significant permit modification.

d. As provided in COMAR 26.11.03.15B(5), an administrative permit amendment may be used to make a change that would otherwise require a significant permit modification if procedures for enhanced preconstruction review of the change are followed that satisfy the requirements of 40 CFR 70.7(d)(1)(v).

e. Before making a change that qualifies as a significant permit modification, the Permittee shall obtain all permits-to-construct and approvals required by COMAR 26.11.02.

f. The Permittee shall not make a significant permit modification that results in a violation of any applicable requirement of the Clean Air Act.

g. The permit shield in COMAR 26.11.03.23 applies to a final significant permit modification that has been issued by the Department, to the extent applicable under COMAR 26.11.03.23.

13. MINOR PERMIT MODIFICATIONS

[COMAR 26.11.03.16]

The Permittee may apply to the Department to make a minor modification to the federally enforceable provisions of this Part 70 permit as provided in COMAR 26.11.03.16 and in accordance with the following conditions:

a. A minor permit modification is a Part 70 permit revision that:

(1) Does not result in a violation of any applicable requirement of the Clean Air Act;

(2) Does not significantly revise existing federally enforceable monitoring, including test methods, reporting, record keeping, or compliance certification requirements except by:

(a) Adding new requirements,

(b) Eliminating the requirements if they are rendered meaningless because the emissions to which the requirements apply will no longer occur, or

(c) Changing from one approved test method for a pollutant and source category to another;

(3) Does not require or modify a:

(a) Case-by-case determination of a federally enforceable emissions standard,

(b) Source specific determination for temporary sources of ambient impacts, or

(c) Visibility or increment analysis;

(4) Does not seek to establish or modify a federally enforceable permit term or condition for which there is no corresponding underlying applicable requirement of the Clean Air Act, but that the Permittee has assumed to avoid an applicable requirement to which the source would otherwise be subject, including:

(a) A federally enforceable emissions standard applied to the source pursuant to COMAR 26.11.02.03 to avoid classification as a Title I modification; and

(b) An alternative emissions standard applied to an emissions unit pursuant to regulations promulgated under Section 112(i)(5) of the Clean Air Act

(5) Is not a Title I modification; and

(6) Is not required under COMAR 26.11.03.17 to be processed as a significant modification to this Part 70 permit.

b. Application for a Minor Permit Modification

The Permittee shall submit to the Department an application for a minor permit modification that satisfies the requirements of COMAR 26.11.03.03 which includes the following:

(1) A description of the proposed change, the emissions resulting from the change, and any new applicable requirements that will apply if the change is made;

(2) The proposed minor permit modification;

(3) Certification by a responsible official, in accordance with COMAR 26.11.02.02F, that:

(1) The proposed change meets the criteria for a minor permit modification, and

(2) The Permittee has obtained or applied for all required permits-to-construct required by COMAR 26.11.03.16 with respect to the proposed change;

(4) Completed forms for the Department to use to notify the EPA and affected states, as required by COMAR 26.11.03.07-.12.

c. Permittee's Ability to Make Change

(1) For changes proposed as minor permit modifications to this permit that will require the applicant to obtain a permit to construct, the permit to construct must be issued prior to the new change.

(2) During the period of time after the Permittee applies for a minor modification but before the Department acts in accordance with COMAR 26.11.03.16F(2):

(a) The Permittee shall comply with applicable requirements of the Clean Air Act related to the change and the permit terms and conditions described in the application for the minor modification.

(b) The Permittee is not required to comply with the terms and conditions in the permit it seeks to modify. If the Permittee fails to comply with the terms and conditions in the application during this time, the terms and conditions of both this permit and the application for modification may be enforced against it.

d. The Permittee is subject to enforcement action if it is determined at any time that a change made under COMAR 26.11.03.16 is not within the scope of this regulation.

e. Minor permit modification procedures may be used for Part 70 permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, but only to the extent that the minor permit modification procedures are explicitly provided for in regulations approved by the EPA as part of the Maryland SIP or in other applicable requirements of the Clean Air Act.

14. ADMINISTRATIVE PART 70 OPERATING PERMIT AMENDMENTS

[COMAR 26.11.03.15]

The Permittee may apply to the department to make an administrative permit amendment as provided in COMAR 26.11.03.15 and in accordance with the following conditions:

a. An application for an administrative permit amendment shall:

(1) Be in writing;

(2) Include a statement certified by a responsible official that the proposed amendment meets the criteria in COMAR 26.11.03.15 for an administrative permit amendment, and

(3) Identify those provisions of this part 70 permit for which the amendment is requested, including the basis for the request.

b. An administrative permit amendment:

(1) Is a correction of a typographical error;

(2) Identifies a change in the name, address, or phone number of a person identified in this permit, or a similar administrative change involving the Permittee or other matters which are not directly related to the control of air pollution;

(3) requires more frequent monitoring or reporting by the Permittee;

(4) Allows for a change in ownership or operational control of a source for which the Department determines that no other revision to the permit is necessary and is documented as per COMAR 26.11.03.15B(4);

(5) Incorporates into this permit the requirements from preconstruction review permits or approvals issued by the Department in accordance with COMAR 26.11.03.15B(5), but only if it satisfies 40 CFR 70.7(d)(1)(v);

(6) Incorporates any other type of change, as approved by the EPA, which is similar to those in COMAR 26.11.03.15B(1)—(4);

(7) Notwithstanding COMAR 26.11.03.15B(1)—(6), all modifications to acid rain control provisions included in this Part 70 permit are governed by applicable requirements promulgated under Title IV of the Clean Air Act; or

(8) Incorporates any change to a term or condition specified as State-only enforceable, if the Permittee has obtained all necessary permits-to-construct and approvals that apply to the change.

c. The Permittee may make the change addressed in the application for an administrative amendment upon receipt by the Department of the application, if all permits-to-construct or approvals otherwise required by COMAR 26.11.02 prior to making the change have first been obtained from the Department.

d. The permit shield in COMAR 26.11.03.23 applies to administrative permit amendments made under Section B(5) of COMAR 26.11.03.15 , but only after the Department takes final action to revise the permit.

e. The Permittee is subject to enforcement action if it is determined at any time that a change made under COMAR 26.11.03.15 is not within the scope of this regulation.

15. OFF-PERMIT CHANGES TO THIS SOURCE

[COMAR 26.11.03.19]

The Permittee may make off-permit changes to this facility as provided in COMAR 26.11.03.19 and in accordance with the following conditions:

a. The Permittee may make a change to this permitted facility that is not addressed or prohibited by the federally enforceable conditions of this Part 70 permit without obtaining a Part 70 permit revision if:

(1) The Permittee has obtained all permits and approvals required by COMAR 26.11.02 and .03;

(2) The change is not subject to any requirements under Title IV of the Clean Air Act;

(3) The change is not a Title I modification; and

(4) The change does not violate an applicable requirement of the Clean Air Act or a federally enforceable term or condition of the permit.

b. For a change that qualifies under COMAR 26.11.03.19, the Permittee shall provide contemporaneous written notice to the Department and the EPA, except for a change to an emissions unit or activity that is exempt from the Part 70 permit application, as provided in COMAR 26.11.03.04. This written notice shall describe the change, including the date it was made, any change in emissions, including the pollutants emitted, and any new applicable requirements of the Clean Air Act that apply as a result of the change.

c. Upon satisfying the requirements of COMAR 26.11.03.19, the Permittee may make the proposed change.

d. The Permittee shall keep a record describing:

(1) Changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement of the Clean Air Act , but not otherwise regulated under this permit; and

(2) The emissions resulting from those changes.

e. Changes that qualify under COMAR 26.11.03.19 are not subject to the requirements for Part 70 revisions.

f. The Permittee shall include each off-permit change under COMAR 26.11.03.19 in the application for renewal of the part 70 permit.

g. The permit shield in COMAR 26.11.03.23 does not apply to off-permit changes made under COMAR 26.11.03.19.

h. The Permittee is subject to enforcement action if it is determined that an off-permit change made under COMAR 26.11.03.19 is not within the scope of this regulation.

16. ON-PERMIT CHANGES TO SOURCES

[COMAR 26.11.03.18]

The Permittee may make on-permit changes that are allowed under Section 502(b)(10) of the Clean Air Act as provided in COMAR 26.11.03.18 and in accordance with the following conditions:

a. The Permittee may make a change to this facility without obtaining a revision to this Part 70 permit if:

(1) The change is not a Title I modification;

(2) The change does not result in emissions in excess of those expressly allowed under the federally enforceable provisions of the Part 70 permit for the permitted facility or for an emissions unit within the facility, whether expressed as a rate of emissions or in terms of total emissions;

(3) The Permittee has obtained all permits and approvals required by COMAR 26.11.02 and .03;

(4) The change does not violate an applicable requirement of the Clean Air Act;

(5) The change does not violate a federally enforceable permit term or condition related to monitoring, including test methods, record keeping, reporting, or compliance certification requirements;

(6) The change does not violate a federally enforceable permit term or condition limiting hours of operation, work practices, fuel usage, raw material usage, or production levels if the term or condition has been established to limit emissions allowable under this permit;

(7) If applicable, the change does not modify a federally enforceable provision of a compliance plan or schedule in this Part 70 permit unless the Department has approved the change in writing; and

(8) This permit does not expressly prohibit the change under COMAR 26.11.03.18.

b. The Permittee shall notify the Department and the EPA in writing of a proposed on-permit change under COMAR 26.11.03.18 not later than 7 days before the change is made. The written information shall include the following information:

(1) A description of the proposed change;

(2) The date on which the change is proposed to be made;

(3) Any change in emissions resulting from the change, including the pollutants emitted;

(4) Any new applicable requirement of the Clean Air Act; and

(5) Any permit term or condition that would no longer apply.

c. The responsible official of this facility shall certify in accordance with COMAR 26.11.02.02F that the proposed change meets the criteria for the use of on-permit changes under COMAR 26.11.03.18.

d. The Permittee shall attach a copy of each notice required by condition b. above to this Part 70 permit.

e. On-permit changes that qualify under COMAR 26.11.03.18 are not subject to the requirements for part 70 permit revisions.

f. Upon satisfying the requirements under COMAR 26.11.03.18, the Permittee may make the proposed change.

g. The permit shield in COMAR 26.11.03.23 does not apply to on-permit changes under COMAR 26.11.03.18.

h. The Permittee is subject to enforcement action if it is determined that an on-permit change made under COMAR 26.11.03.18 is not within the scope of the regulation or violates any requirement of the State air pollution control law.

17. FEE PAYMENT

[COMAR 26.11.02.16A(2) & (5)(b)]

a. The fee for this Part 70 permit is as prescribed in Regulation .19 of COMAR 26.11.02.

b. The fee is due on and shall be paid on or before each 12-month anniversary date of the permit.

c. Failure to pay the annual permit fee constitutes cause for revocation of the permit by the Department.

18. REQUIREMENTS FOR PERMITS-TO-CONSTRUCT AND APPROVALS

[COMAR 26.11.02.09.]

The Permittee may not construct or modify or cause to be constructed or modified any of the following sources without first obtaining, and having in current effect, the specified permits-to-construct and approvals:

a. New Source Review source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;

b. Prevention of Significant Deterioration source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;

c. New Source Performance Standard source, as defined in COMAR 26.11.01.01, permit to construct required, except for generating stations constructed by electric companies;

d. National Emission Standards for Hazardous Air Pollutants source, as defined in COMAR 26.11.01.01, permit to construct required, except for generating stations constructed by electric companies;

e. A stationary source of lead that discharges one ton per year or more of lead or lead compounds measured as elemental lead, permit to construct required, except for generating stations constructed by electric companies;

f. All stationary sources of air pollution, including installations and air pollution control equipment, except as listed in COMAR 26.11.02.10, permit to construct required;

g. In the event of a conflict between the applicability of (a. - e.) above and an exemption listed in COMAR 26.11.02.10, the provision that requires a permit applies.

h. Approval of a PSD or NSR source by the Department does not relieve the Permittee obtaining an approval from also obtaining all permits-to-construct required by (c.- g.) above.

19. CONSOLIDATION OF PROCEDURES FOR PUBLIC PARTICIPATION

[COMAR 26.11.02.11C] and [COMAR 26.11.03.01K]

The Permittee may request the Department to authorize special procedures for the Permittee to apply simultaneously, to the extent possible, for a permit to construct and a revision to this permit.

These procedures may provide for combined public notices, informational meetings, and public hearings for both permits but shall not adversely affect the rights of a person, including EPA and affected states, to obtain information about the application for a permit, to comment on an application, or to challenge a permit that is issued.

These procedures shall not alter any existing permit procedures or time frames.

20. PROPERTY RIGHTS

[COMAR 26.11.03.06E(4)]

This Part 70 permit does not convey any property rights of any sort, or any exclusive privileges.

21. SEVERABILITY

[COMAR 26.11.03.06A(5)]

If any portion of this Part 70 permit is challenged, or any term or condition deemed unenforceable, the remainder of the requirements of the permit continues to be valid.

22. INSPECTION AND ENTRY

[COMAR 26.11.03.06G(3)]

The Permittee shall allow employees and authorized representatives of the Department, the EPA, and local environmental health agencies, upon presentation of credentials or other documents as may be required by law, to:

a. Enter at a reasonable time without delay and without prior notification the Permittee's property where a Part 70 source is located, emissions-related activity is conducted, or records required by this permit are kept;

b. Have access to and make copies of records required by the permit;

c. Inspect all emissions units within the facility subject to the permit and all related monitoring systems, air pollution control equipment, and practices or operations regulated or required by the permit; and

d. Sample or monitor any substances or parameters at or related to the emissions units at the facility for the purpose of determining compliance with the permit.

23. DUTY TO PROVIDE INFORMATION

[COMAR 26.11.03.06E(5)]

The Permittee shall furnish to the Department, within a reasonable time specified by the Department, information requested in writing by the Department in order to determine whether the Permittee is in compliance with the federally enforceable conditions of this Part 70 permit, or whether cause exists for revising or revoking the permit. Upon request, the Permittee shall also furnish to the Department records required to be kept under the permit.

For information claimed by the Permittee to be confidential and therefore potentially not discloseable to the public, the Department may require the Permittee to provide a copy of the records directly to the EPA along with a claim of confidentiality.

The Permittee shall also furnish to the Department, within a reasonable time specified by the Department, information or records requested in writing by the Department in order to determine if the Permittee is in compliance with the State-only enforceable conditions of this permit.

24. COMPLIANCE REQUIREMENTS

[COMAR 26.11.03.06E(1)] and [COMAR 26.11.03.06A(11)] and [COMAR 26.11.02.05]

The Permittee shall comply with the conditions of this Part 70 permit. Noncompliance with the permit constitutes a violation of the Clean Air Act, and/or the Environment Article Title 2 of the Annotated Code of Maryland and may subject the Permittee to:

a. Enforcement action,

b. Permit revocation or revision,

c. Denial of the renewal of a Part 70 permit, or

d. Any combination of these actions.

The conditions in this Part 70 permit are enforceable by EPA and citizens under the Clean Air Act except for the State-only enforceable conditions.

Under Environment Article Section 2-609, Annotated Code of Maryland, the Department may seek immediate injunctive relief against a person who violates this permit in such a manner as to cause a threat to human health or the environment.

25. CREDIBLE EVIDENCE

Nothing in this permit shall be interpreted to preclude the use of credible evidence to demonstrate noncompliance with any term of this permit.

26. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE

[COMAR 26.11.03.06E(2)]

The need to halt or reduce activity in order to comply with the conditions of this permit may not be used as a defense in an enforcement action.

27. CIRCUMVENTION

[COMAR 26.11.01.06]

The Permittee may not install or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total weight of emissions, conceals or dilutes emissions which would otherwise constitute a violation of any applicable air pollution control regulation.

28. PERMIT SHIELD

[COMAR 26.11.03.23]

A permit shield as described in COMAR 26.11.03.23 shall apply only to terms and conditions in this Part 70 permit that have been specifically identified as covered by the permit shield. Neither this permit nor COMAR 26.11.03.23 alters the following:

a. The emergency order provisions in Section 303 of the Clean Air Act, including the authority of EPA under that section;

b. The liability of the Permittee for a violation of an applicable requirement of the Clean Air Act before or when this permit is issued or for a violation that continues after issuance;

c. The requirements of the Acid Rain Program, consistent with Section 408(a) of the Clean Air Act;

d. The ability of the Department or EPA to obtain information from a source pursuant to Maryland law and Section 114 of the Clean Air Act; or

e. The authority of the Department to enforce an applicable requirement of the State air pollution control law that is not an applicable requirement of the Clean Air Act.

29. ALTERNATE OPERATING SCENARIOS

[COMAR 26.11.03.06A(9)]

For all alternate operating scenarios approved by the Department and contained within this permit, the Permittee, while changing from one approved scenario to another, shall contemporaneously record in a log maintained at the facility each scenario under which the emissions unit is operating and the date and time the scenario started and ended.

SECTION III PLANT WIDE CONDITIONS

1. PARTICULATE MATTER FROM CONSTRUCTION AND DEMOLITION

[COMAR 26.11.06.03D]

The Permittee shall not cause or permit any building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne.

2. OPEN BURNING

[COMAR 26.11.07]

Except as provided in COMAR 26.11.07.04, the Permittee shall not cause or permit an open fire from June 1 through August 31 of any calendar year. Prior to any open burning, the Permittee shall request and receive approval from the Department.

3. AIR POLLUTION EPISODE

[COMAR 26.11.05.04]

When requested by the Department, the Permittee shall prepare in writing standby emissions reduction plans, consistent with good industrial practice and safe operating procedures, for reducing emissions creating air pollution during periods of Alert, Warning, and Emergency of an air pollution episode.

4. REPORT OF EXCESS EMISSIONS AND DEVIATIONS

[COMAR 26.11.01.07] and [COMAR 26.11.03.06C(7)]

The Permittee shall comply with the following conditions for occurrences of excess emissions and deviations from requirements of this permit, including those in Section VI – State-only Enforceable Conditions:

a. Report any deviation from permit requirements that could endanger human health or the environment, by orally notifying the Department immediately upon discovery of the deviation;

b. Promptly report all occurrences of excess emissions that are expected to last for one hour or longer by orally notifying the Department of the onset and termination of the occurrence;

c. When requested by the Department the Permittee shall report all deviations from permit conditions, including those attributed to malfunctions as defined in COMAR 26.11.01.07A, within 5 days of the request by submitting a written description of the deviation to the Department. The written report shall include the cause, dates and times of the onset and termination of the deviation, and an account of all actions planned or taken to reduce, eliminate, and prevent recurrence of the deviation;

d. The Permittee shall submit to the Department semi-annual monitoring reports that confirm that all required monitoring was performed, and that provide accounts of all deviations from permit requirements that occurred during the reporting periods. Reporting periods shall be January 1 through June 30 and July 1 through December 31, and reports shall be submitted within 30 days of the end of each reporting period. Each account of deviation shall include a description of the deviation, the dates and times of onset and termination, identification of the person who observed or discovered the deviation, causes and corrective actions taken, and actions taken to prevent recurrence. If no deviations from permit conditions occurred during a reporting period, the Permittee shall submit a written report that so states.

e. When requested by the Department, the Permittee shall submit a written report to the Department within 10 days of receiving the request concerning an occurrence of excess emissions. The report shall contain the information required in COMAR 26.11.01.07D(2).

5. ACCIDENTAL RELEASE PROVISIONS

[COMAR 26.11.03.03B(23)] and [40 CFR 68]

Should the Permittee become subject to 40 CFR 68 during the term of this permit, the Permittee shall submit risk management plans by the date specified in 40 CFR 68.150 and shall certify compliance with the requirements of 40 CFR 68 as part of the annual compliance certification as required by 40 CFR 70.

The Permittee shall initiate a permit revision or reopening according to the procedures of 40 CFR 70.7 to incorporate appropriate permit conditions into the Permittee's Part 70 permit.

6. GENERAL TESTING REQUIREMENTS

[COMAR 26.11.01.04]

The Department may require the Permittee to conduct, or have conducted, testing to determine compliance with this Part 70 permit. The Department, at its option, may witness or conduct these tests. This testing shall be done at a reasonable time, and all information gathered during a testing operation shall be provided to the Department.

7. EMISSIONS TEST METHODS

[COMAR 26.11.01.04]

Compliance with the emissions standards and limitations in this Part 70 permit shall be determined by the test methods designated and described below or other test methods submitted to and approved by the Department.

Reference documents of the test methods approved by the Department include the following:

a. 40 CFR 60, appendix A

b. 40 CFR 51, appendix M

c. The Department's Technical Memorandum 91-01 "Test Methods and Equipment Specifications for Stationary Sources", (January 1991), as amended through Supplement 3, (October 1, 1997)

8. EMISSIONS CERTIFICATION REPORT

[COMAR 26.11.01.05-1] and [COMAR 26.11.02.19C] and [COMAR 26.11.02.19D]

The Permittee shall certify actual annual emissions of regulated pollutants from the facility on a calendar year basis.

a. The certification shall be on forms obtained from the Department and submitted to the Department not later than April 1 of the year following the year for which the certification is required;

b. The individual making the certification shall certify that the information is accurate to the individual's best knowledge. The individual shall be:

(1) Familiar with each source for which the certifications forms are submitted, and

(2) Responsible for the accuracy of the emissions information;

c. The Permittee shall maintain records necessary to support the emissions certification including the following information if applicable:

(1) The total amount of actual emissions of each regulated pollutant and the total of all regulated pollutants;

(2) An explanation of the methods used to quantify the emissions and the operating schedules and production data that were used to determine emissions, including significant assumptions made;

(3) Amounts, types and analyses of all fuels used;

(4) Emissions data from continuous emissions monitors that are required by this permit, including monitor calibration and malfunction information;

(5) Identification, description, and use records of all air pollution control equipment and compliance monitoring equipment including:

(a) Significant maintenance performed,
(b) Malfunctions and downtime, and
(c) Episodes of reduced efficiency of all equipment;

(6) Limitations on source operation or any work practice standards that significantly affect emissions; and

(7) Other relevant information as required by the Department.

9. COMPLIANCE CERTIFICATION REPORT

[COMAR 26.11.03.06G(6) and (7)]

The Permittee shall submit to the Department and EPA Region III a report certifying compliance with each term of this Part 70 permit including each applicable standard, emissions limitation, and work practice for the previous calendar year by April 1 of each year.

a. The compliance certification shall include:

(1) The identification of each term or condition of this permit which is the basis of the certification;

(2) The compliance status;

(3) Whether the compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of each source, currently and over the reporting period; and

(5) Any other information required to be reported to the Department that is necessary to determine the compliance status of the Permittee with this permit.

b. The Permittee shall submit the compliance certification reports to the Department and EPA simultaneously.

10. CERTIFICATION BY RESPONSIBLE OFFICIAL

[COMAR 26.11.02.02F]

All application forms, reports, and compliance certifications submitted pursuant to this permit shall be certified by a responsible official as to truth, accuracy, and completeness. The Permittee shall expeditiously notify the Department of an appointment of a new responsible official.

The certification shall be in the following form:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

11. SAMPLING AND EMISSIONS TESTING RECORD KEEPING

[COMAR 26.11.03.06C(5)]

The Permittee shall gather and retain the following information when sampling and testing for compliance demonstrations:

a. The location as specified in this permit, and the date and time that samples and measurements are taken;

b. All pertinent operating conditions existing at the time that samples and measurements are taken;

c. The date that each analysis of a sample or emissions test is performed and the name of the person taking the sample or performing the emissions test;

d. The identity of the Permittee, individual, or other entity that performed the analysis;

e. The analytical techniques and methods used; and

f. The results of each analysis.

12. GENERAL RECORDKEEPING

[COMAR 26.11.03.06C(6)]

The Permittee shall retain records of all monitoring data and information that support the compliance certification for a period of five (5) years from the date that the monitoring, sample measurement, application, report or emissions test was completed or submitted to the Department.

These records and support information shall include:

a. All calibration and maintenance records;

b. All original data collected from continuous monitoring instrumentation;

c. Records which support the annual emissions certification; and

d. Copies of all reports required by this permit.

13. GENERAL CONFORMITY

[COMAR 26.11.26.09]

The Permittee shall comply with the general conformity requirements of 40 CFR 93, Subpart B and COMAR 26.11.26.09.

14. ASBESTOS PROVISIONS

[40 CFR 61, Subpart M]

The Permittee shall comply with 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

15. OZONE DEPLETING REGULATIONS

[40 CFR 82, Subpart F]

The Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for MVACs in subpart B:

a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the prohibitions and required practices pursuant to 40 CFR 82.154 and 82.156.

b. Equipment used during the maintenance, service, repair or disposal of appliances shall comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repairs or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.

d. Persons disposing of small appliances, MVACS, and MVAC-like appliances as defined in 40 CFR 82.152, shall comply with record keeping requirements pursuant to 40 CFR 82.155.

e. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.

f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

16. ACID RAIN PERMIT

Not applicable

SECTION IV PLANT SPECIFIC CONDITIONS

This section provides tables that include the emissions standards, emissions limitations, and work practices applicable to each emissions unit located at this facility. The Permittee shall comply with all applicable emissions standards, emissions limitations and work practices included herein.

The tables also include testing, monitoring, record keeping and reporting requirements specific to each emissions unit. In addition to the requirements included here in **Section IV**, the Permittee is also subject to the general testing, monitoring, record keeping and reporting requirements included in **Section III – Plant Wide Conditions** of this permit.

Unless otherwise provided in the specific requirements for an emissions unit, the Permittee shall maintain at the facility for at least five (5) years, and shall make available to the Department upon request, all records that the Permittee is required under this section to establish. [Authority: COMAR 26.11.03.06C(5)(g)]

Table IV – 1	
1.0	**Emissions Unit Number(s)** Gasoline Storage tanks: EU-1 to EU-4, installed in 1960. (ARA Registration No. 510-0730-9-0997) EU-1 : one 2,818,000-gallon close top tank equipped with internal floating roof with primary and secondary seals (Tank #7) EU-2 : one 2,818,000-gallon close top tank equipped with internal floating roof with primary and secondary seals (Tank #8) EU-3 : one 2,818,000-gallon close top tank equipped with internal floating roof with primary and secondary seals (Tank #9) EU-4 : one 2,818,000-gallon close top tank equipped with internal floating roof with primary and secondary seals (Tank #10)
1.1	**Applicable Standards/Limits:** Control of VOC and HAP A. **COMAR 26.11.13.03A(1)(a) to (b)**, which requires the Permittee to meet the following equipment requirements for large, close top storage tanks, with a capacity of 40,000 gallons or greater storing gasoline or VOC having a True Vapor Pressure (TVP) between 1.5 psia and 11 psia inclusive:

Table IV – 1

(1) The tank's gauging and sampling devices shall be gas tight except when in use.

(2) Each tank shall be equipped with one of the following properly installed, operating, and well maintained emission control systems **[Authority: COMAR 26.11.13.03A(1)(b)]**:

(a) An internal floating roof equipped with a primary and secondary seal,

(b) A pressure tank system that maintains a pressure at all times to prevent loss of vapors to the atmosphere, or

(c) A vapor control system capable of collecting the vapors from the tank and disposing of these vapors to prevent their emission to the atmosphere.

B. **COMAR 26.11.13.03A(2)** which requires the Permittee to meet the following seal requirements:

(1) There shall be no visible holes, tears, or other openings in the seal or seal fabric.

(2) Each seal shall be intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall.

(3) The accumulated area of the gaps between the secondary seal and the tank wall and between the seal and other obstructions inside the tank (that is, ladder, roof supports, gauging and sampling devices) that are greater than 1/8 inch in width may not exceed 1.0 square inch per foot of tank diameter.

C. **40 CFR 63, Subpart BBBBBB** which requires the Permittee to meet emission limits and management practices for gasoline storage tanks at bulk gasoline terminals.

The Permittee has elected to comply with 40 CFR 63, Subpart BBBBBB by equipping each tank with an internal floating roof meeting the following specifications:

(1) The internal floating roof shall be floating on the liquid surface (but not necessarily in complete contact with it) inside the storage vessel at all times, except during initial fill and during those

Table IV – 1	
	intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. **[Authority: 40 CFR §60.112b(a)(1)(i), §63.11087(a), and Table 1 to 40 CFR, Part 63, Subpart BBBBBB, requirement 2(b)]** [Note: These requirements also satisfy the requirements of COMAR 26.11.13.03A(1)(b) and COMAR 26.11.13.03A(2).] (2) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: (a) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank. (b) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof. (3) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface. **[Authority: 40 CFR §60.112b(a)(1), §63.11087(a) and (b) and Table 1, Option 2(b) of 40 CFR 63, Subpart BBBBBB]**
1.2	**Testing Requirements:** Control of VOC and HAP A. See monitoring and record keeping requirements. B. and C A person owning or operating a gasoline or VOC storage tank shall determine the total seal gap by summing the areas of the individual gaps. The lengths and widths of the gaps are measured by passing a 1/8 inch diameter probe between the seal and the tank wall and other obstructions in the tank. (The probe should move freely without forcing or binding against the seal.) **[Authority: COMAR 26.11.13.03A(4)]**

Table IV – 1

1.3 Monitoring Requirements:

Control of VOC and HAP

A.

The Permittee shall perform an annual visual inspection of each tank's gauging and sampling devices. If a visual inspection shows noncompliance with the gas tight requirement, the Permittee shall repair the device within 45 days or empty and remove the tank from service within 45 days.

If a repair cannot be made within 45 days and if the tank cannot be emptied within 45 days, a 30-day extension may be requested from the Department. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the Permittee will take that assure that the device will be repaired or the tank will be emptied as soon as possible. **[Authority: COMAR 26.11.02.02H and COMAR 26.11.13.03A(1)(a)]**

B. and C.

The Permittee shall comply with the following inspection requirements:

(1) The Permittee shall visually inspect the internal floating roof, the primary seal, and the secondary seal, prior to filling or refilling the storage vessel with volatile organic liquid. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the Permittee shall repair the items before filling or refilling the storage vessel. **[Authority: 40 CFR §60.113b(a)(1), §63.11087(c), and §63.11092(e)(1)]**

(2) The Permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal through manholes and roof hatches on the fixed roof at least once every twelve (12) months after initial fill. If the internal floating roof is not resting on the surface of the volatile organic liquid 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 45 days, and perform an internal inspection of the floating roof and seals. If a failure that is

Table IV – 1

detected during inspections cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Department in the inspection report required by 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 Permittee will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
[Authority: COMAR 26.11.13.03A(3)(a), COMAR 26.11.13.03A(3)(b), 40 CFR §60.113b(a)(2), §60.113b(a)(3)(ii), §63.11087(c), and §63.11092(e)(1)]

Note: the annual inspection requirements of 40 CFR, Part 60, Subpart Kb §60.113b(a)(2) and (a)(3)(ii) satisfy the annual inspection requirements of COMAR 26.11.13.03A(3)(a) and (b).

(3) The Permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal, 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 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 10 percent open area, the Permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with volatile organic liquid. The storage vessel shall be emptied, degassed, and inspected in accordance with the specifications of this paragraph at a frequency of no less than once every ten (10) years.
[Authority: COMAR 26.11.13.03A(3)(c), 40 CFR §60.113b(a)(3)(i), §60.113b(a)(4), §63.11087(c), and §63.11092(e)(1)]

Note: the internal inspection requirements of 40 CFR, Part 60, Subpart Kb §60.113b(a)(3)(i) and (a)(4) satisfy the internal inspection requirements of COMAR 26.11.13.03A(3)(c).

Table IV – 1	
1.4	**Record Keeping Requirements:** Control of VOC and HAP A. The Permittee shall record the results of all visual inspections of each tank's gauging and sampling devices. The Permittee shall also record all repairs or replacements including the date and the action taken. **[Authority: COMAR 26.11.03.06C]** B. and C. The Permittee shall maintain the following records: **[Authority: COMAR 26.11.13.03C(4)]** (1) Each inspection performed as required by 40 CFR §60.113b(a)(1), (a)(2), (a)(3), and (a)(4) and COMAR 26.11.13.03A(3) for each storage tank. 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). This information shall also be included in the semiannual compliance report required by 40 CFR §63.11095(a). **[Authority: COMAR 26.11.13.03C(1), 40 CFR §60.115b(a)(2), §63.11087(e), §63.11094(a), and §63.11095(a)(1)]** (2) All repairs or replacement of the seals, including the date and the action taken for each storage tank. **[Authority: COMAR 26.11.13.03C(2)]** (3) The Permittee shall record the average monthly storage temperature and throughput for each storage tank. **[Authority: COMAR 26.11.13.03C(3)]**
1.5	**Reporting Requirements:** Control of VOC and HAP A. Records of visual inspections of each tank's gauging and sampling devices shall be made available to the Department upon request. **[Authority: COMAR 26.11.03.06C]**

Table IV – 1

B. and C.

The Permittee shall meet the following reporting requirements:

(1) The Permittee shall notify the Department in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by 40 CFR 60.113b(a)(1) and (a)(4) to afford the Department the opportunity to have an observer present. If the inspection required by 40 CFR 60.113b(a)(4) is not planned and the Permittee could not have known about the inspection 30 days in advance of refilling the tank, the Permittee shall notify the Department at least fifteen (15) days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Department at least fifteen (15) days prior to the refilling. **[Authority: COMAR 26.11.13.03A(3)(d), 40 CFR §60.113b(a)(5), §63.11087(c), and §63.11092(e)(1)]**

(2) If any of the conditions described in 40 CFR §60.113b(a)(2) are detected during the annual visual inspection required by 40 CFR §60.113b(a)(2), a report shall be furnished to the Department within 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. This information shall also be included in the semiannual compliance report required by 40 CFR §63.11095(a). **[Authority: 40 CFR §60.115b(a)(3), §63.11087(e), §63.11094(a), and §63.11095(a)(1)]**

(3) After each inspection required by 40 CFR §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR §60.113b(a)(3)(ii), a report shall be furnished to the Department within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR §60.112b(a)(1) or §60.113b(a)(3) and list each repair made. This information shall also be included in the semiannual compliance report required by 40 CFR

Table IV – 1	
	§63.11095(a). **[Authority: 40 CFR §60.115b(a)(4), §63.11087(e), §63.11094(a), and §63.11095(a)(1)]** (4) The Permittee shall submit a semiannual compliance report to the Department as specified in 40 CFR §63.11095(a). The report shall include the following information: (a) Records of each inspection performed for each of the storage tanks as required by 40 CFR §60.113b(a)(1), (a)(2), (a)(3), (a)(4), and COMAR 26.11.13.03A(3). **[Authority: 40 CFR §60.115b(a)(2), §63.11087(e), and §63.11095(a)(1)]** (b) Reports of any of the storage tanks having the defects described in 40 CFR §60.113b(a)(2) that are detected during the annual visual inspection required by 40 CFR §60.113b(a)(2). **[Authority: 40 CFR §60.115b(a)(3), §63.11087(e), and §63.11095(a)(1)]** (c) Reports that find any of the storage tanks not meeting the specifications of 40 CFR §60.112b(a)(1) or §60.113b(a)(3) during inspections required by 40 CFR §60.113b(a)(3). **[Authority: 40 CFR §60.115b(a)(4), §63.11087(e), and §63.11095(a)(1)]**

"A permit shield shall cover the applicable requirements identified for the emission unit(s) listed in the table above."

Table IV – 1a	
1.0a	**Emissions Unit Number(s)** Gasoline Storage tank EU-5, installed in 1960. (ARA Registration No. 510-0730-9-0997) EU-5 : one 10,654,000-gallon open top tank equipped with external floating roof with primary and secondary seals (Tank #11) Each tank was constructed prior to 1960.

Table IV – 1a	
1.1a	**Applicable Standards/Limits:** A. Control of VOC (1) **COMAR 26.11.13.03B(2)** which states that the Permittee shall not place or store gasoline or VOC having a true vapor pressure (TVP) of 1.5 psia (10.3 kilonewton/square meter) or greater in any open top tank with a capacity of 40,000 gallons (151,400 liters) or greater unless it is equipped with a properly installed and maintained external floating roof that meets all the following requirements: (a) The external floating roof shall be equipped with a primary and secondary seal. (b) Openings in the external floating roof, except for automatic bleeder vents, rim space vents, and leg sleeves, shall be equipped with a projection below the liquid surface. The opening with projections shall also be equipped with a cover, seal, or lid, which shall be maintained in a closed position at all times, except when the device is in actual use. (c) Automatic bleeder vents shall be closed at all times except when the roof is resting on the roof supports. Rim vents shall be set to the open position when the roof is being floated off the leg supports or at the manufacturer's recommended setting. (d) Roof drains shall be provided with a slotted membrane fabric or equivalent cover that encapsulates at least 90 percent of the area of the drain opening. (2) **COMAR 26.11.13.03B(3)** which states that the Permittee shall meet the following seal requirements when storing gasoline or VOC having a true vapor pressure (TVP) of 1.5 psia (10.3 kilonewton/square meter) or greater in any open top tank with a capacity of 40,000 gallons (151,400 liters) or greater: (a) There shall be no visible holes, tears, or other openings in a seal or seal fabric. (b) Each seal shall be intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall.

Table IV – 1a

(c) The accumulated area of the gaps between the secondary seal and the tank wall that are greater than 1/8 inch in width may not exceed 1.0 square inch per foot of tank diameter.

B. Control of HAP

40 CFR 63, Subpart BBBBBB which requires the Permittee to meet emission limits and management practices for gasoline storage tanks. At the first degassing and cleaning activity or by January 10, 2018, whichever comes first, the Permittee shall comply with 40 CFR 63, Subpart BBBBBB by equipping each tank with an external floating roof meeting the following specifications prior to storing gasoline in the tank:

(1) Each external floating roof shall be equipped with a closure device between the wall of the storage vessel and the roof edge. The closure device is to consist of two seals, one above the other. The lower seal is referred to as the primary seal, and the upper seal is referred to as the secondary seal.

(a) The primary seal shall be either a mechanical shoe seal or a liquid-mounted seal. Except as provided in 40 CFR §60.113b(b)(4), the seal shall completely cover the annular space between the edge of the floating roof and tank wall.

(b) The secondary seal shall completely cover the annular space between the external floating roof and the wall of the storage vessel in a continuous fashion except as allowed in §60.113b(b)(4).

[Authority: 40 CFR §60.112b(a)(2)(i), §63.11087(a), and Table 1 to 40 CFR 63, Subpart BBBBBB].

(2) If a tank does not meet the requirements of 40 CFR §60.112b(a)(2)(i):

(a) Except for automatic bleeder vents and rim space vents, each opening in a noncontact external floating roof shall provide a projection below the liquid surface.

Table IV – 1a	
	(b) Except for automatic bleeder vents, rim space vents, roof drains, and leg sleeves, each opening in the roof is to be equipped with a gasketed cover, seal, or lid that is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. (c) Automatic bleeder vents are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. (d) Rim vents are to be set to open when the roof is being floated off the roof legs supports or at the manufacturer's recommended setting. (e) Automatic bleeder vents and rim space vents are to be gasketed. (f) Each emergency roof drain is to be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening. **[Authority: 40 CFR §60.112b(a)(2)(ii), §63.11087(a), and Table 1 to 40 CFR 63, Subpart BBBBBB].** (3) The roof shall be floating on the liquid at all times (i.e., off the roof leg supports) except during initial fill until the roof is lifted off leg supports and when the tank is completely emptied and subsequently refilled. The process of filling, emptying, or refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible. **[Authority: 40 CFR §60.112b(a)(2)(iii), §63.11087(a), and Table 1 to 40 CFR 63, Subpart BBBBBB].**
1.2a	**Testing Requirements:** A. Control of VOC When storing gasoline or VOC having a true vapor pressure (TVP) of 1.5 psia (10.3 kilonewton/square meter) or greater, the Permittee shall once a year, determine the total secondary seal gap by summing the areas of the individual gaps between the secondary seal and the tank wall over the entire circumference of the tank. The lengths and widths of the gaps are measured by passing a 1/8 inch uniform diameter probe between the seal and tank wall. (The probe shall move freely without forcing or binding against the seal.) **[Authority: COMAR 26.11.13.03B(4)(b)]**

Table IV – 1a

B. Control of HAP

The Permittee shall meet the following requirements for each tank storing gasoline:

(1) Determine the gap areas and maximum gap widths, between the primary seal and the wall of the storage vessel and between the secondary seal and the wall of the storage vessel according to the following frequency.

(a) Measurements of gaps between the tank wall and the primary seal (seal gaps) shall be performed at least once every 5 years.

(b) Measurements of gaps between the tank wall and the secondary seal shall be performed at least once per year.
[Authority: 40 CFR §60.113b(b)(1) and §63.11092(e)(2)]

(2) Determine gap widths and areas in the primary and secondary seals individually by the following procedures:

(a) Measure seal gaps, if any, at one or more floating roof levels when the roof is floating off the roof leg supports.

(b) Measure seal gaps around the entire circumference of the tank in each place where a 0.32-cm diameter uniform probe passes freely (without forcing or binding against seal) between the seal and the wall of the storage vessel and measure the circumferential distance of each such location.

(c) The total surface area of each gap shall be determined by using probes of various widths to measure accurately the actual distance from the tank wall to the seal and multiplying each such width by its respective circumferential distance.
[Authority: 40 CFR §60.113b(b)(2) and §63.11092(e)(2)]

(3) Add the gap surface area of each gap location for the primary seal and the secondary seal individually and divide the sum for each seal by the nominal diameter of the tank and compare each ratio to the respective standards and make necessary repairs or empty the storage vessel within 45 days of identification in any inspection for seals not meeting the following requirements:

Table IV – 1a	
	(a) The accumulated area of gaps between the tank wall and the mechanical shoe or liquid-mounted primary seal shall not exceed 212 cm^2 per meter of tank diameter, and the width of any portion of any gap shall not exceed 3.81 cm. (i) One end of the mechanical shoe is to extend into the stored liquid, and the other end is to extend a minimum vertical distance of 61 cm above the stored liquid surface. (ii) There are to be no holes, tears, or other openings in the shoe, seal fabric, or seal envelope. (b) The secondary seal is to meet the following requirements: (i) The secondary seal is to be installed above the primary seal so that it completely covers the space between the roof edge and the tank wall except as provided in 40 CFR §60.113 (b)(2)(iii). (ii) The accumulated area of gaps between the tank wall and the secondary seal shall not exceed 21.2 cm^2 per meter of tank diameter, and the width of any portion of any gap shall not exceed 1.27 cm. (iii) There are to be no holes, tears, or other openings in the seal or seal fabric. (c) If a failure that is detected during inspections required in 40 CFR §60.113b(b)(1) cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Department in the inspection report required in 40 CFR §60.115b(b)(4). Such extension request must include a demonstration of unavailability of alternate storage capacity and a specification of a schedule that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. **[Authority: 40 CFR §60.113b(b)(3) and (4) and §63.11092(e)(2)]**

Table IV – 1a	
1.3a	**Monitoring Requirements:** A. Control of VOC When storing gasoline or VOC having a true vapor pressure (TVP) of 1.5 psia (10.3 kilonewton/square meter) or greater, the Permittee shall perform semiannual routine visual inspections of the primary and secondary seals. **[Authority: COMAR 26.11.13.03B(4)(a)]** B. Control of HAP When the tank is used for storing gasoline, the Permittee shall visually inspect the external floating roof, the primary seal, secondary seal, and fittings each time the vessel is emptied and degassed. If the external floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, the Permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before filling or refilling the storage vessel with gasoline. **[Authority: 40 CFR §60.113b(b)(6) and (b)(6)(i) and §63.11092(e)(2)]**
1.4a	**Record Keeping Requirements:** A. Control of VOC The Permittee shall keep the following records for the storage tank: (1) The results of all inspections of floating roofs and seals; (2) Records of all repairs or replacement of the seals, including the date and the action taken; and (3) For the tank, records of the average monthly storage temperature and throughput. **[Authority: COMAR 26.11.13.03C(1), (2) and (3)]** B. Control of HAP The Permittee shall keep a record of each gap measurement performed as required by 40 CFR §60.113b(b). Each record shall identify the storage vessel in which the measurement was performed and shall contain: (1) The date of measurement.

Table IV – 1a	
	(2) The raw data obtained in the measurement. (3) The calculations described in 40 CFR §60.113b (b)(2) and (b)(3). **[Authority: 40 CFR §60.115b(b)(3), §63.11087(e) and §63.11094(a)]**
1.5a	**Reporting Requirements:** A. Control of VOC The Permittee shall meet the following reporting requirements: (1) Notify the Department of an intended tank inspection at least 15 days before the proposed inspection date; and (2) Make all required records available to the Department upon request. **[Authority: COMAR 26.11.13.03B(4)(c) and 26.11.13.03C(4)]** B. Control of HAP (1) The Permittee shall notify the Department at least 30 days in advance of any gap measurements required by paragraph 40 CFR §60.113b(b)(1) to afford the Department the opportunity to have an observer present. **[Authority: 40 CFR §60.113b(b)(5) and §63.11092(e)(2)]** (2) For all the inspections required by 40 CFR §60.113b(b)(6), the Permittee shall notify the Department in writing at least 30 days prior to the filling or refilling of each storage vessel to afford the Department the opportunity to inspect the storage vessel prior to refilling. If the inspection required is not planned and Permittee could not have known about the inspection 30 days in advance of refilling the tank, the Permittee shall notify the Department at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Department at least 7 days prior to the refilling. **[Authority: 40 CFR §60.113b(b)(6)(ii) and §63.11092(e)(2)]**

Table IV – 1a	
	(3) Within 60 days of performing the seal gap measurements required by 40 CFR §60.113b(b)(1), the Permittee shall furnish the Department with a report that contains: (a) The date of measurement. (b) The raw data obtained in the measurement. (c) The calculations described in 40 CFR §60.113b(b)(2) and (b)(3). **[Authority: 40 CFR §60.115b(b)(2), §63.11087(e) and §63.11094(a)]** (4) After each seal gap measurement that detects gaps exceeding the limitations specified by 40 CFR §60.113b(b)(4), the Permittee shall submit a report to the Department within 30 days of the inspection. The report will identify the vessel and contain the information specified in 40 CFR §60.115b(b)(2) and the date the vessel was emptied or the repairs made and date of repair. **[Authority: 40 CFR §60.115b(b)(4), §63.11087(e) and §63.11094(a)]** (5) The Permittee shall submit a semiannual compliance report to the Department. The report shall include: (a) The information specified in 40 CFR §60.115b(b); and (b) For any tank complying with 40 CFR §63.11087(b) after the January 10, 2011 compliance date, the Notification of Compliance Status information for each tank that achieves compliance with 40 CFR 63, Subpart BBBBBB during the reporting period. **[Authority: 40 CFR §60.11095(a)(1) and (4)]**

"A permit shield shall cover the applicable requirements identified for the emission unit(s) listed in the table above."

Table IV – 2	
2.0	**Emissions Unit Numbers** ARA Registration Number: 510-0730-9-1075 EU-6: Tank No. 29-1 – 29,600-gal fixed-roof above ground ethanol storage tank (12ft D x 35 ft H).

Table IV – 2	
	EU-7: Tank No. 29-2 – 29,600-gal fixed-roof above ground ethanol storage tank (12ft D x 35 ft H). EU-8: Tank No. 29-3– 29,600-gal fixed-roof above ground ethanol storage tank (12ft D x 35 ft H). EU-10: Tank No. 29-4– 29,600-gal fixed-roof above ground ethanol storage tank (12ft D x 35 ft H). EU-11: Tank No. 29-5– 29,600-gal fixed-roof above ground ethanol storage tank (12ft D x 35 ft H).
2.1	**Applicable Standards/Limits:** A. Control of VOC COMAR 26.11.06.06B(1)(b) which requires that the Permittee limit emissions of VOC to not more than 20 pounds per day from installations constructed after May 12, 1972 unless VOC emissions are reduced by 85 percent or more overall. B. Operational Limitation The Permittee shall store only ethanol that do not subject any of the storage tanks to the requirements of COMAR 26.11.13 and/or 40 CFR 60, Subpart Kb unless the Permittee obtains an approval from the Department. **[Authority: COMAR 26.11.02.09A]**
2.2	**Testing Requirements:** A and B. See record keeping and reporting requirements.
2.3	**Monitoring Requirements:** A and B. See record keeping and reporting requirements.
2.4	**Record Keeping Requirements:** A and B. The Permittee shall keep records and make them available to the Department upon request of the amounts, types, and composition of all materials loaded into each tank.

Table IV – 2	
2.5	**Reporting Requirements:** A and B. The Permittee shall report incidences of excess emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations". **[Authority: COMAR 26.11.03.06C]**

"A permit shield shall cover the applicable requirements identified for the emission unit(s) listed in the table above."

Table IV – 3	
3.0	**Emissions Unit Number(s)** EU-9 (ARA Registration No. 510-0730-9-0997) One (1) truck loading rack equipped with one(1) McGill Environmental Systems Model EVC air-assisted flare
3.1	**Applicable Standards/Limits:** A. Visible Emissions Limitation **COMAR 26.11.06.02C(2)**, which prohibits visible emissions other than water in an uncombined form. This limitation applies to the flare only. Exceptions. **COMAR 26.11.06.02A(2)** establishes that COMAR 26.11.06.02C does not apply to emissions during start-up, and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) the visible emissions are not greater than 40 percent opacity; and (b) the visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period. B. Control of VOC and HAP (Vapor Collection and Control Requirements) **COMAR 26.11.13.04A(1)(a) and 40 CFR 63, Subpart BBBBBB** which require vapor collection and control as follows: (1) The loading rack shall be equipped with a vapor collection and control system designed to collect the total organic compound vapors displaced from cargo tanks during product loading.

Table IV – 3

(2) The vapor collection and control system shall control at least 90 percent of all vapors and emissions may not exceed 0.29 pounds of VOC per 1,000 gallons (35 milligrams of total organic compounds per liter) of gasoline or VOC loaded into gasoline cargo tanks at the loading rack.
[Authority: COMAR 26.11.13.04A(1)(a), 40 CFR §63.11088(a), §63.11092(d), Table 2, Items 1(a) and 1(b) of 40 CFR 63, Subpart BBBBBB.]

C. Control of VOC and HAP (Vapor Tight Cargo Tank Requirements)

COMAR 26.11.13.05 and 40 CFR 63, Subpart BBBBBB which require the Permittee to load gasoline only into vapor tight gasoline cargo tanks that have been certified as capable of sustaining a pressure change of not more than 3 inches of water in 5 minutes when pressurized to a gauge pressure of 18 inches of water, or evacuated to a gauge pressure of 6 inches of water, during a test. **[Authority: COMAR 26.11.13.05A, 40 CFR §60.502(e), 40 CFR §63.11088(a), and Table 2, Item 1(d) of 40 CFR 63, Subpart BBBBBB]**

D. Control of VOC and HAP (Back Pressure and Leak Requirements)

COMAR 26.11.13.04A(1)(b) and 40 CFR 63, Subpart BBBBBB which require the Permittee design and operate the vapor collection and control system and the loading equipment so that during loading:

(1) The gauge pressure in the delivery tank does not exceed 4,500 pascals.

(2) No pressure-vacuum vent in the vapor collection and control system begins to open at a system pressure less than 4,500 pascals.

(3) The gasoline or VOC cargo tank pressure does not exceed 18 inches of water, and vacuum does not exceed 6 inches of water.

(4) There are no gasoline or VOC leaks in the system during loading or unloading operations.
[Authority: COMAR 26.11.13.04A(1)(b), 40 CFR §60.502(h), (i), and (j), 40 CFR §63.11088(a), and Table 2, Item 1(d) of 40 CFR 63, Subpart BBBBBB]

Table IV – 3	
	E. Control of VOC and HAP (Design and Operational Requirements) COMAR 26.11.13.04A(1)(c) and 40 CFR 63, Subpart BBBBBB which specify the following design and operational requirements: (1) The Permittee shall design and operate the vapor collection system to prevent any total organic compound vapors collected at one loading lane from passing through another loading lane to the atmosphere. (2) The Permittee shall assure that loadings of gasoline or VOC cargo tanks are made only into tanks equipped with vapor collection equipment that is compatible with the facility's vapor collection system. (3) The Permittee shall assure that the facility's and the cargo tank's vapor collection systems are connected during each loading of a gasoline or VOC cargo tank. (4) The Permittee shall equip the facility's loading rack with a top submerged or bottom loading system. (5) The exhaust gases from the loading rack shall vent through the VRU or the VCU prior to discharging to the atmosphere. **[Authority: COMAR 26.11.13.04A(1)(c), 40 CFR §60.502(f) and (g), 40 CFR §63.11088(a), Table 2, Items 1(c) and 1(d) of 40 CFR 63, Subpart BBBBBB]**
3.2	**Testing Requirements:** A. Visible Emissions Limitations See Monitoring, Record Keeping, and Reporting Requirements. B. Control of VOC and HAP (Vapor Collection and Control Requirements) See Monitoring, Record Keeping, and Reporting Requirements. C. Control of VOC and HAP (Vapor Tight Cargo Tank Requirements) The annual certification test for gasoline cargo tanks shall consist of the following test methods:

Table IV – 3

EPA Method 27, Appendix A-8, 40 CFR, Part 60 and Method 1007 of the Department's Technical Memorandum 91-01, "Test Methods and Equipment Specifications for Stationary Sources," which is incorporated by reference in COMAR 26.11.01.04C.

The test shall be conducted using a time period (t) for the pressure and vacuum tests of 5 minutes. The initial pressure (P_i) for the pressure test shall be 18 inches of water, gauge. The initial vacuum (V_i) for the vacuum test shall be 6 inches of water, gauge. The maximum allowable pressure and vacuum changes (Δ p, Δ v) for all affected gasoline cargo tanks is 3 inches of water, or less, in 5 minutes. Any needed repairs shall be completed and the cargo tank shall be retested within 15 days of the original test date. **[Authority: COMAR 26.11.13.05B, 40 CFR §63.11088(d), and §63.11092(f)(1)]**

D. Control of VOC and HAP (Back Pressure and Leak Requirements)

(1) Testing for leak-tight conditions, as required in §A(1)(b)(ii) of this regulation, shall be conducted as prescribed in Method 1008 of the Department's Technical Memorandum 91-01, "Test Methods and Equipment Specifications for Stationary Sources" which is incorporated by reference in COMAR 26.11.01.04C. **[Authority: COMAR 26.11.13.04A(3)(a)]**

(2) A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with ±2.5 mm of water precision, shall be calibrated and installed on the facility's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline cargo tank. **[Authority: 40 CFR §60.502(h), §60.503(d), 40 CFR §63.11088(a), and Table 2, Item 1(d) of 40 CFR 63, Subpart BBBBBB]**

E. Control of VOC and HAP (Design and Operational Requirements)

(1) The loading rack and vapor collection and control systems are designed to operate as required. **[Authority: COMAR 26.11.03.06C]**

(2) The performance test requirements of §63.11092(a) do not apply to flares defined in §63.11100 and meeting the flare requirements in §63.11(b).

Table IV – 3	
	The owner or operator shall demonstrate that the flare and associated vapor collection system is in compliance with the requirements in §63.11(b) and 40 CFR 60.503(a), (b), and (d). **[40 CFR §63.11092(a)(4)]** (3) In conducting the performance tests required in 40 CFR§60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of 40 CFR§60 or other methods and procedures as specified in 40 CFR§60.8, except as provided in §60.8(b). The three-run requirement of §60.8(f) does not apply to this subpart. **[40 CFR 60.503(a)]** (4) Immediately before the performance test required to determine compliance with 40 CFR §60.502 (b), (c), and (h), the owner or operator shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The owner or operator shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test. **[40 CFR 60.503(b)]** (5) The owner or operator shall determine compliance with the standard in 40 CFR §60.502(h) for vapor collection and liquid loading equipment, designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. **[40 CFR 60.503(d)]**
3.3	**Monitoring Requirements:** A. Visible Emissions Limitations (1) The Permittee shall observe, at least once a week during the loading of a tank truck, the stack of the flare for visible emissions as specified under Indicator 1 of the CAM Plan for the flare. **[Authority: COMAR 26.11.03.06C and Indicator No. 1 of the CAM Plan for the flare in Table IV-CAM of this permit.]** If visible emissions are observed from the flare, the Permittee shall perform the following unless it can be shown, through a Method 9 test, no visible emission observed: (a) inspect the flare operating system; (b) perform all necessary repairs and/or adjustments to the flare, so that the visible emissions are eliminated;

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(c) document, in writing, the results of the inspections and the repairs and/or adjustments made to the flare; and

(d) if visible emissions continue to be observed after repairs and adjustments are made, the Permittee shall perform a Method 9 observation for a 12-minute period. The Permittee shall continue to perform a Method 9 observation for a 12-minute period on each day that a tank truck is loaded until visible emissions are no longer observed. [COMAR 26.11.03.06C]

(2) check bypass valve to ensure no bypass of the flare is occurring at least once per month with manual log entry. **[Authority: See indicator 3 of the CAM Plan, Table IV-4]**

B. Control of VOC and HAP (Vapor Collection and Control Requirements)

When the flare is used to control emissions from the loading rack, the Permittee shall comply with the CAM Plan for the flare in Table IV-CAM of this permit and the following requirements:

(1) Owners or operators using flares to comply with the provisions of §63.11(b) shall monitor these control devices to assure that they are operated and maintained in conformance with their designs. **[40 CFR§63.11 (b)(1)]**

(2) Flares shall be steam-assisted, air-assisted, or non-assisted. **[40 CFR§63.11 (b)(2)]**

(3) Flares shall be operated at all times when emissions may be vented to them. **[40 CFR§63.11 (b)(3)]**

(4) Flares shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. Test Method 22 in appendix A of part 60 of this chapter shall be used to determine the compliance of flares with the visible emission provisions of this part. The observation period is 2 hours and shall be used according to Method 22. **[40 CFR§63.11 (b)(4)]**

(5) Flares shall be operated with a flame present at all times. The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame.

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A heat –sensing thermocouple to measure the temperature of the pilot flame for monitoring its presence is specified under Indicator No. 2 of the CAM Plan for the VCU. **[40 CFR§63.11 (b)(5)]**

(6) An owner/operator has the choice of adhering to the heat content specifications in 40 CFR§63.11 (b)(6)(ii), and the maximum tip velocity specifications 40 CFR §63.11(b)(8).

(7) Flares shall be used only with the net heating value of the gas being combusted at 11.2 MJ/scm (300 Btu/scf) or greater if the flare is steam-assisted or air-assisted. [The minimum heating value of the gas to be burned at Center point terminal Baltimore is 1574 Btu/scf, which is well above the limit of 300 Btu/scf.] **[40 CFR§63.11 (b)(6)]**

(8) Air-assisted flares shall be designed and operated with an exit velocity less than the velocity V_{max}. The maximum permitted velocity, V_{max}, for air-assisted flares shall be determined by the following equation:

$V_{max} = 8.71+0.708(H_T)$

Where:

V_{max} = Maximum permitted velocity, m/sec.

8.71=Constant.

0.708=Constant.

H_T = The net heating value (MJ/scm).

[The design maximum exit velocity of 60 ft/s at Center point terminal Baltimore is also well below the limit of 165 ft/s for gas with a heating value of 1574 Btu/scf.] **[40 CFR§63.11 (b)(8)]**

(9) Where a flare meeting the requirements in §63.11(b) is used, a heat-sensing device, such as an ultraviolet beam sensor or a thermocouple, must be installed in proximity to the pilot light to indicate the presence of a flame. [**40 CFR §63.11092(b)(2)]**

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(10) The Permittee shall maintain a flare monitoring and inspection plan that describes the Permittee's approach for meeting the following requirements:

(a) The flare shall be equipped to automatically prevent gasoline loading operations from beginning at any time that the pilot flame is absent.

(b) The Permittee shall verify, during each day of operation of the loading rack, the proper operation of the assist-air blower and the vapor line valve. Verification shall be through visual observation, or through an automated alarm or shutdown system that monitors system operation. A manual or electronic record of the start and end of a shutdown event may be used.

(c) The Permittee shall perform quarterly preventive maintenance inspections of the flare, including the automated alarm or shutdown system, according to the recommendations of the manufacturer of the system and as specified under Indicator No. 4 of the CAM Plan for the flare.

(d) The monitoring and inspection plan shall specify conditions that would be considered malfunctions of the flare during the inspections or automated monitoring, describe specific corrective actions that will be taken to correct any malfunction, and define what the Permittee owner or operator would consider to be a timely repair for each potential malfunction.

(11) Malfunctions that are discovered shall not constitute a violation of the emission standard in 40 CFR §63.11088(a) if corrective actions as described in the monitoring and inspection plan are followed. The Permittee must:

(a) Initiate corrective action to determine the cause of the problem within 1 hour;

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(b) Initiate corrective action to fix the problem within 24 hours;

(c) Complete all corrective actions needed to fix the problem as soon as practicable consistent with good air pollution control practices for minimizing emissions;

(d) Minimize periods of start-up, shutdown, or malfunction; and

(e) Take any necessary corrective actions to restore normal operation and prevent the recurrence of the cause of the problem.

[Authority: 40 CFR §63.11092(a)(4), 40 CFR §63.11092(b)(2), §63.11092(d)(4), COMAR 26.11.03.06C, and the CAM Plan for the flare in Table IV-CAM of this permit.]

C. Control of VOC and HAP (Vapor Tight Cargo Tank Requirements)

The Permittee shall assure that loadings of gasoline or VOC into cargo tanks are limited to vapor-tight cargo tanks using the following procedures:

(1) The Permittee shall obtain the vapor tightness documentation specified in 40 CFR §60.505(b) and COMAR 26.11.13.05D(2) for each gasoline or VOC cargo tank which is to be loaded at the facility.

(2) The Permittee shall require the tank identification number to be recorded as each gasoline or VOC cargo tank is loaded at the facility.

(3) The Permittee shall cross-check each tank identification number with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded.

(4) The Permittee shall take steps to assure that any nonvapor-tight cargo tank will not be reloaded at the facility until vapor tightness documentation for that tank is obtained.

(5) Alternative procedures may be approved by the Department as specified in 40 CFR §60.502(e)(6).

Table IV – 3	
	[Authority: COMAR 26.11.13.05D(2), 40 CFR §60.502(e)(1), (2), (3), (5) and (6), 40 CFR §63.11088(a), and Table 2, Item 1(d) of 40 CFR 63, Subpart BBBBBB] D. Control of VOC and HAP (Back Pressure and Leak Requirements) (1) Each calendar month, the vapor collection system, the vapor processing system, and the loading rack handling gasoline shall be inspected during the loading of gasoline cargo tanks for total organic compounds liquid or vapor leaks. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected. **[Authority: COMAR 26.11.13.04A(3)(a), 40 CFR §60.502(j), 40 CFR §63.11088(a), Table 2, Item 1(d) of 40 CFR 63, Subpart BBBBBB, and Indicator No. 4 of the CAM Plan for the VCU in Table IV-CAM of this permit.]** (2) Each calendar month, the Permittee shall check the back pressure in the vapor collection system during loading of cargo tanks. **[Authority: COMAR 26.11.03.06C and Indicator No. 3 of the CAM Plan for the VCU in Table IV-CAM of this permit.]** E. Control of VOC and HAP (Design and Operational Requirements) The loading rack and vapor collection and control systems are designed to operate as required. **[Authority: COMAR 26.11.03.06C]**
3.4	**Record Keeping Requirements:** A. Visible Emissions Limitations The Permittee shall maintain records of visible emissions observations as specified under Indicator 1 of the CAM Plan for the flare. **[Authority: COMAR 26.11.03.06C and Indicator No. 1 of the CAM Plan for the VCU in Table IV-CAM of this permit.]** B. Control of VOC and HAP (Vapor Collection and Control Requirements) The Permittee shall keep the following records for the flare: (1) Records of all maintenance and repairs performed on the flare. (2) An up-to-date, readily accessible copy of the flare monitoring and inspection plan.

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(3) Records, as specified in the flare monitoring and inspection plan of any system malfunction and any activation of the automated alarm or shutdown system with a written entry into a log book or other permanent form of record. Such record shall also include a description of the corrective action taken and whether such corrective actions were taken in a timely manner, as defined in the flare monitoring and inspection plan, as well as an estimate of the amount of gasoline loaded during the period of the malfunction.
[COMAR 26.11.03.06C and the CAM Plan for the VCU in Table IV-CAM of this permit.]

C. Control of VOC and HAP (Vapor Tight Cargo Tank Requirements)

(1) The Permittee shall maintain records of each cargo tank's vapor tightness documentation on file at the facility in a permanent form available for inspection.
The documentation file for each cargo tank shall be updated at least once per year to reflect current test results as determined by EPA Reference Method 27 or Method 1007 of the Department's Technical Memorandum 91-01, "Test Methods and Equipment Specifications for Stationary Sources," which is incorporated by reference in COMAR 26.11.01.04C.

This documentation shall include, at a minimum, the following information:

(a) Test title: Gasoline Delivery Tank Pressure Test – EPA Reference Method 27 or Method 1007 of the Department's Technical Memorandum 91-01
(b) Tank owner and address.
(c) Tank identification number.
(d) Testing location.
(e) Date of test.
(f) Date and type of repair, if applicable.
(g) Date of retest, if applicable.
(h) Tester name and signature.
(i) Witnessing inspector, if any: Name, signature, and affiliation.
(j) Vapor tightness repair: nature of repair work and when performed in relation to vapor tightness testing.

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(k) Test results: Actual pressure change in 5 minutes, millimeters of water (average for two (2) runs).
(l) Pressure testing: the initial and final test pressure, the time of each reading, and the actual pressure change.
(m) Vacuum testing: the initial and final test vacuum, the time of each reading, and the actual vacuum change.
(n) Number of leaks found with an instrument and leak definition.

[Authority: COMAR 26.11.13.05D(1)(a), COMAR 26.11.13.05D(2), 40 CFR §60.505(b), 40 CFR §63.11088(f), and §63.11094(b)]

(2) As an alternative to keeping records at the facility of each gasoline cargo tank test result as required in 40 CFR §63.11094(b), the Permittee may comply with one of the following requirements:

(a) An electronic copy of each record is instantly available at the facility and the copy of each record is an exact duplicate image of the original paper record with certifying signatures; or

(b) For facilities that use a facility automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by the Department during the course of a site visit, or within a mutually agreeable time frame, and the copy of each record is an exact duplicate image of the original paper record with certifying signatures.

[Authority: 40 CFR 40 CFR §63.11088(f) and §63.11094(c)]

D. Control of VOC and HAP (Back Pressure and Leak Requirements)

The Permittee shall maintain the following records:

(1) Monthly leak inspection records including, as a minimum, the following information:
(a) Date of inspection.
(b) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak.

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	(c) Leak determination method. (d) Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days). (e) Inspector name and signature. **[Authority: COMAR 26.11.13.04A(3)(a), 40 CFR §60.502(j), 40 CFR §63.11088(a), Table 2, Item 1(d) of 40 CFR 63, Subpart BBBBBB, and Indicator No. 4 of the CAM Plan for the VCU in Table IV-CAM of this permit.]** (2) Monthly records of the back pressure reading in the vapor collection system. **[Authority: COMAR 26.11.03.06C and Indicator No. 3 of the CAM Plan for the VCU in Table IV-CAM of this permit.]** E. Control of VOC and HAP (Design and Operational Requirements) The loading rack and vapor collection and control systems are designed to operate as required. **[Authority: COMAR 26.11.03.06C]**
3.5	**Reporting Requirements:** A. Visible Emissions Limitations The Permittee shall submit reports of visible emissions observations as specified under Indicator 1 of the CAM Plan for the flare. **[Authority: COMAR 26.11.03.06C and Indicator No. 1 of the CAM Plan for the VCU in Table IV-CAM]** B. Control of VOC and HAP (Vapor Collection and Control Requirements) The Permittee shall submit an excess emissions report to the Department at the time the semiannual compliance report is submitted as specified in 40 CFR §63.11095(b). The report shall include the following information: (1) Each exceedance or failure to maintain, as appropriate, a monitored operating parameter value determined under 40 CFR §63.11092(b). The report shall include the monitoring data for the days on which exceedances or failures to maintain have occurred, and a description and timing of the steps taken to repair or perform maintenance on the vapor collection and processing systems or the continuous monitoring system (CMS).

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(2) The Permittee shall submit all information concerning out-of-control periods for the CEMS, including start and end dates and hours and descriptions of corrective actions taken.

(3) Each instance in which malfunctions discovered during the monitoring and inspections for the flare were not resolved according to the necessary corrective actions described in the flare monitoring and inspection plan. The report shall include a description of the malfunction and the timing of the steps taken to correct the malfunction.

[Authority: COMAR 26.11.03.06C, §63.11095(b)(3) and (4), and the CAM Plan for the flare in Table IV-CAM of this permit.]

C. Control of VOC and HAP (Vapor Tight Cargo Tank Requirements)

(1) The Permittee shall notify the owner or operator of each non-vapor-tight gasoline or VOC cargo tank loaded at the facility within one (1) week of the documentation cross-check required by 40 CFR §60.502(e)(3), or within three (3) weeks after the loading has occurred. **[Authority: 40 CFR §60.502(e)(4), 40 CFR §63.11088(a), and Table 2, Item 1(d) of 40 CFR 63, Subpart BBBBBB]**

(2) The Permittee shall submit a semiannual compliance report to the Department as specified in 40 CFR §63.11095(a). The report shall include the following information for the loading rack: each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility. **[Authority: 40 CFR §63.11088(f) and §63.11095(a)(3)]**

(3) The Permittee shall submit an excess emissions report to the Department at the time the semiannual compliance report is submitted as specified in 40 CFR §63.11095(b). The report shall include the following information for gasoline cargo tanks:

(a) Each instance of a non-vapor-tight gasoline cargo tank loading at the facility in which the owner or operator failed to take steps to assure that such cargo tank would not be reloaded at the facility before vapor tightness documentation for that cargo tank was obtained.

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	(b) Each reloading of a non-vapor-tight gasoline cargo tank at the facility before vapor tightness documentation for that cargo tank is obtained by the facility in accordance with 40 CFR §63.11094(b). **[Authority: 40 CFR §63.11095(b)(1) and (2)]** D. Control of VOC and HAP (Back Pressure and Leak Requirements) The Permittee shall include leak inspection and back pressure records in the semiannual compliance report and excess emissions report as specified in 40 CFR §63.11095(a) and (b). **[Authority: 40 CFR §63.11088(f), §63.11095(a) and (b).]** E. Control of VOC and HAP (Design and Operational Requirements) The loading rack and vapor collection and control systems are designed to operate as required. **[Authority: COMAR 26.11.03.06C]**

"A permit shield shall cover the applicable requirements identified for the emission unit(s) listed in the table above."

CAM PLAN
For McGill Environmental Systems Model EVC air-assisted flare

Part 64 Requirement	CAM Plan
	Indicator No. 1
I. Indicator 64.4(a)(1)	Operate flare with no visible emissions.
Monitoring Approach	A visible emission observation is made of the exhaust gases at the outlet of the flare during the loading of a gasoline tank truck
II. Indicator Range 64.4(a)(2) Reporting Threshold	No visible emissions. An excursion occurs if the visible emissions are observed. An excursion will trigger an investigation, corrective action, and a reporting requirement. All excursions will be reported to the ARA in the semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	

Part 64 Requirement	CAM Plan
	Indicator No. 1
A. Data Representatives	Observations made by trained personnel
B. Verification of Operational Status	Visible emission observation with manual log entry.
C. QA/QC Practices and Criteria	The observers are trained on procedures in making an observation and the record keeping requirements.
D. Monitoring Frequency	At least once per week when the gasoline tank truck is loading.
E. Data Collection	Results of observations will be manually recorded and maintained on site. Records will include date, time, and result of observation or reason.
F. Averaging Period	None.

Part 64 Requirement	CAM Plan
	Indicator No. 2
I. Indicator 64.4(a)(1)	Operate Flare with pilot flame present at all times.
Monitoring Approach	Monitor temperature of pilot flame.
II. Indicator Range 64.4(a)(2)	Presence of flame. An excursion occurs if the pilot flame temperature is out of normal operation range or pilot flame is not present. An excursion will trigger an investigation, corrective action, and a reporting requirement.
Reporting Threshold	All excursions and corrective actions taken shall be reported to the ARA in the semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representatives	Temperature recorded automatically on chart paper.

Part 64 Requirement	CAM Plan
	Indicator No. 2
B. Verification of Operational Status	Daily check of temperature chart recording with manual log entry of verification of present of pilot flame.
C. QA/QC Practices and Criteria	Calibration, maintenance and operation of thermocouple according to manufacturer's specification.
D. Monitoring Frequency	Continuous
E. Data Collection	Automatic record the temperature of the flare when it is operating with records maintained on site.
F. Averaging Period	None.

Part 64 Requirement	CAM Plan
	Indicator No. 3
I. Indicator 64.4(a)(1)	Ensure no bypass of the flare is occurring.
Monitoring Approach	Inspect bypass valve seals.
IV. Indicator Range 64.4(a)(2) Reporting Threshold	Closed valve An excursion occurs if the bypass valve is not closed or sealed completely. An excursion will trigger an investigation, corrective action, and a reporting requirement. All excursions and corrective actions taken shall be reported to the ARA in the semi-annual monitoring reports.
V. Performance Criteria 64.4(a)(3)	
A. Data Representatives	Inspections made by trained personnel.
B. Verification of Operational Status	Not Applicable.
C. QA/QC Practices and Criteria	None
D. Monitoring Frequency	At least once per month.
E. Data Collection	Results of inspection are manually recorded and maintained on site.
F. Averaging Period	None.

Part 64 Requirement	**CAM Plan**
	Indicator No. 4
I. Indicator 64.4(a)(1)	Documentation of preventative maintenance.
Monitoring Approach	Proper flare operation is verified by performing preventative maintenance as recommended by the FLARE manufacturer four (4) times a year.
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion occurs if the preventative maintenance is not performed or documented. All excursions will be reported to the ARA in the semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representatives	Flare operation verified by trained personnel or service person using a preventative maintenance checklist that is based on recommendations provided by the flare manufacturer.
B. Verification of Operational Status	Not applicable.
C. QA/QC Practices and Criteria	Service persons are trained on inspection and maintenance procedures.
D. Monitoring Frequency	Preventative maintenance will be performed four (4) times during a calendar year.
E. Data Collection	Results of inspection and maintenance performed during preventative maintenance are manually recorded and maintained on site.
F. Averaging Period	None.

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4.0	**Emissions Unit Number(s)** General Facility Wide Requirements
4.1	**Applicable Standards/Limits:** A. Operational and Emissions Limitations to Preclude Applicability of Major Source HAP Requirements Premises wide HAP emissions shall be less than the following limits in any rolling 12-month period: (1) 10 tons for any individual HAP; and (2) 25 tons for the total combination of HAP. **[Authority: COMAR 26.11.03.06]** B. Control of HAP **40 CFR 63, Subpart BBBBBB**, which requires general emission minimization procedures and premises wide leak inspections for control of HAP emissions from bulk gasoline terminals.
4.2	**Testing Requirements:** A. Operational and Emissions Limitations to Preclude Applicability of Major Source HAP Requirements At least once per year, the Permittee shall test or have the fuel supplier test all fuels for HAP content including individual HAP speciation amounts. In lieu of the annual testing requirement, the Permittee may demonstrate compliance with the facility wide HAP limitations through the use of HAP content documentation and/or test data provided by the American Petroleum Institute, the U.S. EPA, or other sources approved by the Department. **[Authority: COMAR 26.11.03.06]** B. Control of HAP See Monitoring, Record Keeping and Reporting Requirements.
4.3	**Monitoring Requirements:** A. Operational and Emissions Limitations to Preclude Applicability of Major Source HAP Requirements

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See Record Keeping and Reporting Requirements.

B. Control of HAP

The Permittee shall comply with the following monitoring requirements:

(1) The Permittee must, at all times, operate and maintain the bulk gasoline terminal, including any associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Department, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the premises. **[Authority: 40 CFR §63.11085(a)]**

(2) The Permittee shall perform a monthly leak inspection of all equipment in gasoline service, as defined in 40 CFR §63.11100, in accordance with the following requirements:

(a) For this inspection, detection methods incorporating sight, sound and smell are acceptable.

(b) A log book shall be used and shall be signed by the Permittee at the completion of each inspection. A section of the log book shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the premises.

(c) Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed with 15 calendar days after detection of each leak, except as provided in 40 CFR §63.11089(d).

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	(d) Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The Permittee shall provide in the semiannual report specified in 40 CFR §63.11095(b), the reason(s) why the repair was not feasible and the date each repair was completed. **[Authority: 40 CFR §63.11089(a) through (d)]**
4.4	**Record Keeping Requirements:** A. Operational and Emissions Limitations to Preclude Applicability of Major Source HAP Requirements The Permittee shall maintain the following records for at least five (5) years and shall be made available to the Department upon request: (1) Premises wide emissions of each individual HAP in tons per month and total tons per rolling 12-month period. (2) Premises wide emissions of total HAP in tons per month and total tons per rolling 12-month period. (3) Monthly throughput of gasoline, ethanol, distillate, and additives. (4) Annual HAP content test results **OR** HAP content documentation and/or other test data from the American Petroleum Institute, the U.S. EPA, or other sources approved by the Department. **[Authority: COMAR 26.11.03.06C]** B. Control of HAP (1) The Permittee shall maintain the following operation and maintenance records: (a) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. (b) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR §63.11085(a), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. **[Authority: 40 CFR §63.11094(g)(1) and (2)]**

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	(2) The Permittee shall maintain the following leak inspection records: (a) The Permittee shall prepare and maintain a record describing the types, identification numbers, and locations of all equipment in gasoline service. If the Permittee implements an instrument program under 40 CFR §63.11089, the record shall contain a full description of the program. (b) The Permittee shall maintain a log book for leak inspections and record the following information for each leak that is detected: (i) The equipment type and identification number. (ii) The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell). (iii) The date the leak was detected and the date of each attempt to repair the leak. (iv) Repair methods applied in each attempt to repair the leak. (v) "Repair delayed" and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak. (vi) The expected date of successful repair of the leak if the leak is not repaired within 15 days. (vii) The date of successful repair of the leak. **[Authority: 40 CFR §63.11089(g), 40 CFR §63.11094(d) and (e)]**
4.5	**Reporting Requirements:** A. Operational and Emissions Limitations to Preclude Applicability of Major Source HAP Requirements (1) The Permittee shall submit the following records to the Department, as part of the annual Emission Certification by April

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1 of each calendar year: **[Authority: COMAR 26.11.02.19C and D]**

(a) Gasoline, ethanol, distillate, and additive throughput.

(b) Facility wide HAP emissions and annual HAP content test results **OR** HAP content documentation and/or other test data from the American Petroleum Institute, the U.S. EPA, or other sources approved by the Department.

(2) The Permittee shall submit a semiannual compliance report to the Department. The semiannual compliance report shall include the following information, as applicable:

(a) The information specified in 40 CFR §60.115b(a). **[Reference: 40 CFR §63.11087(e) and §63.11095(a)(1)]**

(b) For equipment leak inspections, the number of equipment leaks not repaired within 15 days after detection. **[Reference: 40 CFR §63.11089(g) and §63.11095(a)(3)]**

(3) The Permittee shall submit all notifications specified in 40 CFR §63.9, as applicable, to the Department. **[Reference: 40 CFR §63.11087(d), §63.11089(f) and §63.11093(d)]**

B. Control of HAP

The Permittee shall submit a semiannual compliance report to the Department as specified in 40 CFR §63.11095(a). The report shall include the following information:

(1) The number, duration, and a brief description of each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. 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 §63.11085(a), including actions taken to correct a malfunction. **[Authority: 40 CFR §63.11095(d)]**

(2) For equipment leak inspections, the following information:

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	(a) The number of equipment leaks not repaired within 15 days after detection. **[Authority: 40 CFR §63.11095(a)(3)]** (b) An excess emissions report to the Department at the time the semiannual compliance report is submitted that includes the following information for each occurrence of an equipment leak for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detection: (i) The date on which the leak was detected; (ii) The date of each attempt to repair the leak; (iii) The reasons for the delay of repair; and (iv) The date of successful repair. **[Authority: 40 CFR §63.11095(b)(5)]** (c) Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The Permittee shall provide in the semiannual report specified in 40 CFR §63.11095(b), the reason(s) why the repair was not feasible and the date each repair was completed. **[Authority: 40 CFR §63.11089(d)]**

"A permit shield shall cover the applicable requirements identified for the emission unit(s) listed in the table above."

SECTION V INSIGNIFICANT ACTIVITIES

This section provides a list of insignificant emissions units that were reported in the Title V permit application. The applicable Clean Air Act requirements, if any, are listed below the insignificant activity.

(1) Containers, reservoirs, or tanks used exclusively for:

(a) ✓ Storage of butane, propane, or liquefied petroleum, or natural gas;

(b) No. 6 Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel;

Tank #1: 6,341,000-gallon with a cone roof
Tank #2: 6,341,000-gallon with a cone roof
Tank #3: 6,341,000-gallon with a cone roof
Tank #4: 6,275,000-gallon with a cone roof
Tank #5: 3,410,000-gallon with a cone roof
Tank #6: 3,410,000-gallon with a cone roof

(i) VOC emissions from the installations listed in this category are subject to COMAR 26.11.06.06B(1)(a) when storing Number 1 fuel oil, Number 2 fuel oil or aviation jet engine fuel. COMAR 26.11.06.06B(1)(a) requires that the Permittee limit emissions of VOC to not more than 200 pounds per day from installations constructed before May 12, 1972 unless VOC emissions are reduced by 85 percent or more overall.

(ii) The Permittee shall keep records and make them available to the Department upon request of the amounts, types, and composition of all materials loaded into each tank.

(2) and any other emissions unit, not listed in this section, with a potential to emit less than the "de minimus" levels listed in COMAR 26.11.02.10X (list and describe units):

No. 1 500 gallon horizontal storage tank for diesel red dye additive

No. 1 2,350 gal horizontal storage tank for diesel lubricity additive

No. 1 6,000 gal horizontal storage tank for gasoline additive

SECTION VI STATE-ONLY ENFORCEABLE CONDITIONS

The Permittee is subject to the following State-only enforceable requirements:

1. Applicable Regulations:

   (a) COMAR 26.11.06.08 and 26.11.06.09, which generally prohibit the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created.

   (b) COMAR 26.11.15.05, which requires that the Permittee implement "Best Available Control Technology for Toxics" (T – BACT) to control emissions of toxic air pollutants.

   (c) COMAR 26.11.15.06, which prohibits the discharge of toxic air pollutants to the extent that such emissions will unreasonably endanger human health

2. Record Keeping and Reporting:

   The Permittee shall submit to the Department, by April 1 of each year during the term of this permit, a written certification of the results of an analysis of emissions of toxic air pollutants from the Permittee's facility during the previous calendar year. The analysis shall include either:

   (a) a statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid; or

   (b) a revised compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15 & 16, that accounts for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.