

Larry Hogan  
Governor

Boyd Rutherford  
Lieutenant Governor



Ben Grumbles  
Secretary

DEPARTMENT OF THE ENVIRONMENT

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

Construction Permit

Part 70  
Operating Permit

PERMIT NO. 24-013-0056

DATE ISSUED July 1, 2019

PERMIT FEE To be paid in accordance  
with COMAR 26.11.02.19B

EXPIRATION DATE June 30, 2024

LEGAL OWNER & ADDRESS  
Colonial Pipeline Company-Dorsey Junction  
929 Hoods Mill Road  
Woodbine, MD 21797  
Attn: Mr. Frank Gallo, Plant Manager

SITE  
Same  
Carroll County  
AI#76

SOURCE DESCRIPTION

One Pipeline breakout facility.

This permit contains limitations on premises wide emissions of hazardous air pollutants (HAP) and oxides of nitrogen (NOx) in order that Colonial Pipeline Company may be recognized as a synthetic minor source of HAP and NOx.

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

*[Signature]*  
Program Manager

*[Signature]*  
Director, Air and Radiation Administration

**COLONIA PIPELINE COMPANY – DORSEY JUNCTION  
929 HOODS MILL ROAD  
WOODBINE, MD 21797  
PART 70 OPERATING PERMIT NO. 24-013-0056**

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**SECTION I SOURCE IDENTIFICATION**

**1. DESCRIPTION OF FACILITY**

Colonial Pipeline Company - Dorsey Junction (Colonial - Dorsey Junction) is a refined petroleum pipeline breakout station for Colonial's interstate transportation pipeline system. The facility's tank farm includes breakout tanks for gasoline, distillates, transmix, additives, and other supporting equipment. The facility is located in Carroll County, Maryland (Air Quality Region III) which is within the Baltimore ozone non-attainment area. The primary Standard Industrial Classification (SIC) code for this facility is 4613.

Significant sources of air emissions at the facility include petroleum product breakout tanks and fugitive emissions from piping components such as valves, pumps, and connectors.

**2. FACILITY INVENTORY LIST**

<b>Emissions Unit Number</b>	<b>ARA Registration Number</b>	<b>Emissions Unit Name and Description</b>	<b>Date of Installation</b>
<b>Portable EG-1-8</b>	013-0056-9-0202	Group of eight (8) portable diesel emergency generators each rated at 2000 kilowatts to be brought on-site as needed for emergency purposes.	as needed for emergency purposes
<b>EU-D1000</b>	013-0056-9-0101	Tank D1000 – one (1) 4,000-gallon utility tank for bulk storage of red dye.	1996
<b>EU- Air Stripper</b>	013-0056-9-0083	One (1) air stripper for tank bottom water treatment. This emissions unit is included in the insignificant activities table.	1994
<b>Gasoline Breakout Tanks Subject to COMAR 26.11.13.03 and NESHAP 40 CFR 63 Subpart, BBBB</b>			
<b>EU-1010</b>	013-0056-9-0132	2,268,000 gallon gasoline breakout tank equipped with an internal floating roof (IFR).	1963 IFR replaced in 2012
<b>EU-1011</b>	013-0056-9-0132	5,544,000 gallon gasoline breakout tank equipped with an internal floating roof.	1963 IFR replaced in 2016
<b>EU-1012</b>	013-0056-9-0132	1,386,000 gallon gasoline breakout tank equipped with an internal floating roof.	1963 IFR replaced in 2010
<b>EU-1013</b>	013-0056-9-0132	1,386,000 gallon gasoline breakout tank equipped with an internal floating roof.	1963 IFR replaced in 2011

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<b>NSPS 40 CFR 60, Subpart Kb Only</b>			
<b>EU-5200</b>	013-0056-9-0132	21,000 gallon transmix/gasoline phase separation tank equipped with an internal floating roof.	2004 IFR replaced in 2013

Note: For the purposes of this permit, the term "gasoline" means any petroleum distillate or petroleum distillate/alcohol blend having a Reid vapor pressure of 27.6 kilopascals or greater, which is used as a fuel for internal combustion engines, as defined in 40 CFR §63.11100. The gasoline tanks listed above may periodically store distillate or transmix based on operational needs. Transmix tanks may also store distillate periodically based on operational needs.

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SO <sub>2</sub>	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

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- 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.

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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:

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(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:
  - (a) The proposed change meets the criteria for a minor permit modification, and
  - (b) 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.



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- (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.

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- 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;

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- 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;

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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

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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

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**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:

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**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

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- (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.



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- 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.

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**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)]

<b>Table IV – 1</b>	
<b>1.0</b>	<p><b><u>Emissions Unit Number(s)</u></b></p> <p>EU-1010: 2,268,000 gallon gasoline breakout tank equipped with an IFR            EU-1011: 5,544,000 gallon gasoline breakout tank equipped with an IFR            EU-1012: 1,386,000 gallon gasoline breakout tank equipped with an IFR            EU-1013: 1,386,000 gallon gasoline breakout tank equipped with an IFR            EU-1014: 1,008,000 gallon gasoline breakout tank equipped with an IFR            EU-1015: 1,386,000 gallon gasoline breakout tank equipped with an IFR            EU-1016: 2,268,000 gallon gasoline breakout tank equipped with an IFR            EU-1030: 1,386,000 gallon gasoline breakout tank equipped with an IFR            EU-1031: 1,806,000 gallon gasoline breakout tank equipped with an IFR            EU-1032: 6,300,000 gallon gasoline breakout tank equipped with an IFR            EU-1033: 3,360,000 gallon gasoline breakout tank equipped with an IFR            EU-1034: 1,806,000 gallon gasoline breakout tank equipped with an IFR            EU-1040: 1,008,000 gallon gasoline breakout tank equipped with an IFR            EU-1041: 1,008,000 gallon gasoline breakout tank equipped with an IFR</p> <p>Tanks 1040 and 1041 meet the requirements of NESHAP 40 CFR 63, Subpart BBBB by complying with NSPS 40 CFR 60, Subpart Kb</p>

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3. The Permittee shall comply with the following additional roof and seal requirements for each gasoline storage tank:

- (a) The IFR shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside the tank with a fixed roof. The IFR shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the tank 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) and §63.11087(a)]**

- (b) Each opening in a noncontact IFR 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)(iii) and §63.11087(a)]**

4. The Permittee shall comply with the following additional roof and seal requirements for Tank 1040 and Tank 1041:

- (a) Each opening in the IFR except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
- (b) Automatic bleeder vents shall be equipped with a gasket and 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.

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If the tank is not in compliance with the gas-tight requirement, the Permittee shall repair the device 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 will assure that the device will be repaired or the tank will be emptied as soon as possible.

**[Authority: COMAR 26.11.03.06C]**

2. The Permittee shall comply with the following inspection requirements for each gasoline storage tank:

(a) The Permittee shall visually inspect the IFR and the primary seal and the secondary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the IFR is not resting on the surface of the gasoline inside the tank 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 tank from service within 45 days. If a failure that is detected during the required inspection cannot be repaired 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 will assure that the control equipment will be repaired or the tank will be emptied as soon as possible. **[Authority: COMAR 26.11.03.06C, COMAR 26.11.13.03A(3)(a) and (b), 40 CFR §60.113b(a)(2) and (a)(3)(ii), §63.11087(c) and §63.11092(e)(1)]**

(b) The Permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid

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	<p>detected during an inspection, the Permittee shall repair the items or empty and remove the tank from service within 45 days. If a failure that is detected during the required inspection cannot be repaired 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 will assure that the control equipment will be repaired or the tank will be emptied as soon as possible.</p> <p>(ii) Notwithstanding paragraph (i) above, whenever a tank is emptied and degassed for maintenance purposes or integrity assessments, the Permittee shall conduct a full top-side and bottom-side internal inspection of the tank’s IFR and its seals in accordance with 40 CFR 60.112b(a)(4) and 40 CFR 63.11092(e)(1) and paragraph (b) of this section.</p> <p><b>[Authority: U.S. EPA approved alternative monitoring plan as allowed under 40 CFR §60.13 and §63.8. The alternative monitoring plan satisfies the internal inspection requirements specified under COMAR 26.11.13.03A(3)(c), 40 CFR §60.113b(a)(4), §63.11087(c) and §63.11092(e)(1)]</b></p>
<b>1.4</b>	<p><b><u>Record Keeping Requirements:</u></b></p> <p><u>Control of VOC and HAP</u>          The Permittee shall keep the following records on-site for at least five years (unless otherwise specified below):</p> <ol style="list-style-type: none"> <li>1. Records of each visual inspection of a tank’s gauging and sampling devices including the date of the inspection, the results of each inspection, and any repairs made. The records shall be kept on-site for at least five years. <b>[Authority: COMAR 26.11.03.06C]</b></li> <li>2. Records of each external and internal (top-side in-service and full out of service) tank inspection including identification of the tank on which the inspection was performed, the date the tank was inspected, the observed condition of each component of the control equipment</li> </ol>

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<b>Table IV – 1</b>	
	<p>2. The Permittee shall submit a report to the Department within 30 days after each inspection of Tank 1040 or Tank 1041 that finds holes or tears in the seal or seal fabric, or defects in the IFR, or other control equipment defects listed in 40 CFR §60.113b(a)(3)(ii). The report shall identify the tank 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. <b>[Authority: 40 CFR §60.115b(a)(4)]</b></p> <p>3. The Permittee shall submit a semiannual compliance report to the Department. The semiannual compliance report shall include the information specified in 40 CFR §60.115b(a) for all gasoline storage tanks. <b>[Authority: 40 CFR §63.11087(e) and §63.11095(a)(1)]</b></p>

<b>Table IV – 2</b>	
<b>2.0</b>	<p><b><u>Emissions Unit Number(s)</u></b></p> <p>EU-5200: 21,000 gallon gasoline transmix/gasoline phase separation tank equipped with an IFR.</p>
<b>2.1</b>	<p><b><u>Applicable Standards/Limits:</u></b></p> <p><u>Control of VOC</u>          40 CFR 60.112b(a)(1) which requires the Permittee to equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:</p> <p>1. The tank shall be equipped with a fixed roof in combination with an IFR. The IFR shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside the tank with a fixed roof. The IFR shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the tank is completely emptied or subsequently emptied and refilled.</p> <p>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.</p> <p>2. The tank shall be equipped with an IFR with two seals mounted one above the other so that each forms a continuous closure that</p>

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<b>Table IV – 2</b>	
<b>2.2</b>	<p><b><u>Testing Requirements:</u></b></p> <p><u>Control of VOC</u>            See Monitoring, Recordkeeping and Requirements.</p> <p><u>Operating Limitation</u>            See Recordkeeping and Reporting Requirements.</p>
<b>2.3</b>	<p><b><u>Monitoring Requirements:</u></b></p> <p><u>Control of VOC</u>            The Permittee shall meet the following monitoring requirements:</p> <ol style="list-style-type: none"> <li>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 gasoline. 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. <b>[Authority: 40 CFR 60.113b(a)]</b></li> <li>2. The Permittee shall also visually inspect the storage vessel in accordance with the following specifications:               <ol style="list-style-type: none"> <li>(a) The Permittee shall visually inspect the IFR and the primary seal and the secondary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the IFR is not resting on the surface of the gasoline inside the tank 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 tank from service within 45 days. If a failure that is detected during the required inspection cannot be repaired 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 will assure that the control equipment will be repaired or the tank will be emptied as soon as possible. <b>[Authority: 40 CFR §60.113b(a)(2) and (a)(3)(ii)]</b></li> </ol> </li> </ol>

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<b>Table IV – 2</b>	
	<p>3. Records of the Volatile Organic Liquid (VOL) stored, the period of storage, and the maximum true vapor pressure of the VOL during the respective storage period. The maximum true vapor pressure shall be determined using the procedures listed in 40 CFR 60.116b(e). All records shall be kept on-site for at least five (5) years. <b>[Authority: 40 CFR 60.116b(c) and (e)]</b></p> <p><u>Operational Limitation</u>            The Permittee shall keep records and make them available to the Department upon request of the amounts, types, and composition of all materials stored in the tank. <b>[Authority: COMAR 26.11.03.06C]</b></p>
<b>2.5</b>	<p><b><u>Reporting Requirements:</u></b></p> <p><u>Control of VOC</u>            The Permittee shall meet the following reporting requirements:</p> <ol style="list-style-type: none"> <li>1. The Permittee shall notify the Department in writing at least 30 (thirty) days prior to the filling or refilling of the storage vessel for which an inspection is required. If the inspection is not planned and the Permittee could not have known about the inspection 30 (thirty) days in advance or refilling the tank, the Permittee shall notify the Department at least seven (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 (seven) days prior to the refilling. <b>[Authority: 40 CFR 60.113b(a)(5)]</b></li> <li>2. 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), the Permittee shall furnish the Department with a report within 30 (thirty) 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 40 CFR 60.113b(a)(3) and list each repair made. <b>[Authority: 40 CFR 60.115b(a)(4)]</b></li> </ol> <p><u>Operating Limitations</u>            The Permittee shall submit material storage records to the Department upon request. <b>[Authority: COMAR 26.11.03.06C]</b></p>



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<b>Table IV - 3</b>	
	<p>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.</p> <p><u>Operational Limitation:</u>            The Permittee shall apply for and obtain a permit to construct from the Department prior to storing gasoline in Tank 1060 or Tank 1061.  <b>[Authority: ARA premises wide Permit to Construct issued on February 23, 2016]</b></p>
<b>3.2</b>	<p><b><u>Testing Requirements:</u></b></p> <p><u>Control of VOC</u>            The Permittee shall determine the total seal gap during an internal inspection of a tank, 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.) <b>[Authority: COMAR 26.11.13.03A(4)]</b></p> <p><u>Operational Limitation:</u>            See Recordkeeping and Reporting Requirements.</p>
<b>3.3</b>	<p><b><u>Monitoring Requirements:</u></b></p> <p><u>Control of VOC</u></p> <p>1. The Permittee shall perform an annual visual inspection of each tank’s gauging and sampling devices. If the visual inspection shows non-compliance with the gas-tight requirement, the Permittee shall make repairs to return the gauging and sampling devices to a gas tight condition.</p> <p>If the tank is not in compliance with the gas-tight requirement, the Permittee shall repair the device 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 will assure that the</p>

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<b>Table IV - 3</b>	
	<p>any deck fitting gasket, seal, or wiper and any surface that it is intended to seal. If a failure is detected during an inspection, the Permittee shall repair the items or empty and remove the tank from service within 45 days. If a failure that is detected during the required inspection cannot be repaired 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 will assure that the control equipment will be repaired or the tank will be emptied as soon as possible.</p> <p>ii. Notwithstanding paragraph (i) above, whenever a tank is emptied and degassed for maintenance purposes or integrity assessments, the Permittee shall conduct a full top-side and bottom-side internal inspection of the tank's IFR and its seals.</p> <p><b>[Authority: COMAR 26.11.03.06C; U.S. EPA approved alternative monitoring plan as allowed under 40 CFR §60.13 and §63.8 and approved by the Department to satisfy the internal inspection requirements specified under COMAR 26.11.13.03A(3)(c)]</b></p> <p><u>Operational Limitation</u>          See Recordkeeping and Reporting Requirements.</p>
<b>3.4</b>	<p><b><u>Record Keeping Requirements:</u></b></p> <p><u>Control of VOC:</u>          The Permittee shall keep the following records on-site for at least five years (unless otherwise specified below):</p> <ol style="list-style-type: none"> <li>1. Records of each visual inspection of a tank's gauging and sampling devices including the date of the inspection, the results of each inspection, and any repairs made. The records shall be kept on-site for at least five years. <b>[Authority: COMAR 26.11.03.06C]</b></li> <li>2. Records of each external and internal (top-side in-service and full out of service) tank inspection including identification of the tank on which the inspection was performed, the date the tank was inspected, the</li> </ol>

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	COMAR 26.11.06.06 requires that the Permittee limit emissions of VOC to not more than 20 pounds per day unless VOC emissions are reduced by 85 percent or more overall.
<b>4.2</b>	<b><u>Testing Requirements:</u></b>  <u>Control of VOC</u> See Recordkeeping and Reporting Requirements.
<b>4.3</b>	<b><u>Monitoring Requirements:</u></b>  <u>Control of VOC</u> See Recordkeeping and Reporting Requirements.
<b>4.4</b>	<b><u>Record Keeping Requirements:</u></b>  <u>Control of VOC</u> 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 the tank to support calculations demonstrating that emissions of VOC are less than the 20 pounds per day or that the VOC emissions from the tank are reduced by 85 percent or more overall. <b>[Authority: ARA premises wide Permit to Construct issued on February 23, 2016]</b>
<b>4.5</b>	<b><u>Reporting Requirements:</u></b>  <u>Control of VOC</u> The Permittee shall report emissions from the tank as part of the Emissions Certification Report required in Section III, Condition 8 of this permit. <b>[Authority: COMAR 26.11.02.19C and D]</b>

<b>Table IV – 5</b>	
<b>5.0</b>	<b><u>Emissions Unit Number(s)</u></b>  Portable EG-1-8: (8) Eight portable diesel emergency generators each rated at 2000 kilowatts to be brought on-site as needed for emergency purposes. (ARA Registration No. 013-0056-9-0202)
<b>5.1</b>	<b><u>Applicable Standards/Limits:</u></b>  <u>Visible Emissions</u>

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<b>Table IV – 5</b>	
	<p><u>Visible Emissions Limitations</u> See Monitoring, Record Keeping, and Reporting Requirements.</p> <p><u>Control of Sulfur Oxides</u> See Monitoring, Record Keeping, and Reporting Requirements.</p> <p><u>Operational Limitations</u> See Record Keeping and Reporting Requirements.</p>
<b>5.3</b>	<p><b><u>Monitoring Requirements:</u></b></p> <p><u>Visible Emissions Limitations</u> The Permittee shall operate and maintain the stationary internal combustion engine in a manner to prevent visible emissions. <b>[Authority: COMAR 26.11.03.06C]</b></p> <p><u>Control of Sulfur Oxides</u> The Permittee shall obtain a certification from the fuel supplier indicating that the oil complies with the sulfur content requirement for the fuel oil. <b>[Authority: COMAR 26.11.03.06C]</b></p> <p><u>Operational Limitations</u> See Record Keeping and Reporting Requirements.</p>
<b>5.4</b>	<p><b><u>Record Keeping Requirements:</u></b></p> <p><u>Visible Emissions</u> The Permittee shall maintain records of all maintenance/repairs performed and make them available to the Department upon request. The Permittee shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, “Report of Excess Emissions and Deviations.” <b>[Authority: COMAR 26.11.03.06C]</b></p> <p><u>Control of Sulfur Oxides</u> The Permittee shall retain fuel supplier certifications at the premises stating that the fuel is in compliance with the sulfur content requirement for the fuel oil. <b>[Authority: COMAR 26.11.03.06C]</b></p> <p><u>Operational Limitations</u></p>

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<b>Table IV – 6</b>	
	<p>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.</p> <p><u>Operational and Emissions Limitations to Preclude Applicability of Major Source HAP Requirements</u></p> <p>1. Premises wide HAP emissions shall be less than the following limits in any rolling 12-month period:</p> <p style="padding-left: 40px;">(a) 10 tons for any individual HAP; and</p> <p style="padding-left: 40px;">(b) 25 tons for the total combination of HAP.</p> <p>2. Premises wide throughputs of gasoline and distillate shall be less than the following limits in any rolling 12-month period unless the Permittee can demonstrate compliance with premises wide HAP limits at higher throughputs:</p> <p style="padding-left: 40px;">(a) 2,562,840,000 gallons of gasoline (refers to gasoline grades that include conventional, re-formulated and blend stock gasoline, and gasoline-distillate mixtures (e.g., <i>transmix</i>)); and</p> <p style="padding-left: 40px;">(b) 3,055,297,000 gallons of distillates (includes fuel oils and kerosenes); and</p> <p style="padding-left: 40px;">(c) 104,000 gallons of additives.</p> <p><u>Operational and Emissions Limitations to Preclude Applicability of Major Source NOx Requirements</u></p> <p>Premises wide NOx emissions shall be less than 25 tons in any rolling 12 month period. <b>[Authority: ARA premises wide Permit to Construct issued on February 23, 2016]</b></p>
<b>6.2</b>	<p><b><u>Testing Requirements:</u></b></p> <p><u>Control of HAP</u>          See Monitoring, Record Keeping and Reporting Requirements.</p> <p><u>Operational and Emissions Limitations to Preclude Applicability of Major Source HAP Requirements</u>          See Record Keeping and Reporting Requirements.</p>

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	<p>after detection of each leak, except as provided in 40 CFR §63.11089(d).</p> <p>(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.  <b>[Authority: 40 CFR §63.11089(a) through (d)]</b></p> <p><u>Operational and Emissions Limitations to Preclude Applicability of Major Source HAP Requirements</u>            See Record Keeping and Reporting Requirements.</p> <p><u>Operational and Emissions Limitations to Preclude Applicability of Major Source NOx Requirements</u>            See Record Keeping and Reporting Requirements.</p>
<b>6.4</b>	<p><b><u>Record Keeping Requirements:</u></b></p> <p><u>Control of HAP</u></p> <p>1. The Permittee shall maintain the following operation and maintenance records:</p> <p style="padding-left: 40px;">(a) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.</p> <p style="padding-left: 40px;">(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.  <b>[Authority: 40 CFR §63.11094(g)(1) and (2)]</b></p> <p>2. The Permittee shall maintain the following leak inspection records:</p> <p style="padding-left: 40px;">(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</p>

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<b>Table IV – 6</b>	
	<p>3. Total premises wide gasoline throughput in gallons per month and total gallons per rolling 12-month period.</p> <p>4. Total premises wide distillate throughput in gallons per month and total gallons per rolling 12-month period.</p> <p>5. Total premises wide additives throughput in gallons per month and total gallons per rolling 12-month period.  <b>[Authority: COMAR 26.11.03.06C]</b></p> <p><u>Operational and Emissions Limitations to Preclude Applicability of Major Source NOx Requirements</u>            The Permittee shall maintain for at least five (5) years, and shall make available to the Department upon request, records of the following information:</p> <p>Monthly records of estimated premises wide NOx emissions and individual and total HAP emissions. Monthly records of premises wide NOx emissions are required beginning with the first month that any of the fuel combustion equipment registered under ARA Registration No. 013-0056-9-0202 operates at the premises. <b>[Authority: ARA premises wide Permit to Construct issued February 23, 2016]</b></p>
<b>6.5</b>	<p><b><u>Reporting Requirements:</u></b></p> <p><u>Control of HAP</u>            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:</p> <p>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. <b>[Authority: 40 CFR §63.11095(d)]</b></p> <p>2. For equipment leak inspections, the following information:</p>

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**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) No. 5      Stationary internal combustion engines with an output less than 500 brake horsepower (373 kilowatts) and which are not used to generate electricity for sale or for peak or load shaving;

The one (1) 162 hp emergency generator, one (1) 132 hp emergency generator, and three (3) 399 hp emergency fire pump engines are subject to the following requirements:

- (a) COMAR 26.11.09.05E(2), Emissions During Idle Mode: The Permittee may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.
- (b) COMAR 26.11.09.05E(3), Emissions During Operating Mode: The Permittee may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.
- (c) Exceptions:
  - (i) COMAR 26.11.09.05E(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.
  - (ii) COMAR 26.11.09.05E(2) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods:
    - (a) Engines that are idled continuously when not in service: 30 minutes
    - (b) all other engines: 15 minutes.
  - (iii) COMAR 26.11.09.05E(2) & (3) do not apply while maintenance, repair or testing is being performed by qualified mechanics.



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- (vi) use diesel fuel in the engine that meets the requirements of 40 CFR §80.510(b); and
  - (vii) meet the requirements of 40 CFR 63, Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart IIII.
- (2)  Space heaters utilizing direct heat transfer and used solely for comfort heat;
- (3) No. 20 Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less; \*Small containers of tank cleaning solutions only – quantity varies often; two (2) 55-gallon drums of transmix
- (4) Containers, reservoirs, or tanks used exclusively for:
- (a)  Storage of butane, propane, or liquefied petroleum, or natural gas;
  - (b) No. 1 Unheated storage of VOC with an initial boiling point of 300 °F (149 °C) or greater; \*1200-gallon tank for storage of drag reducing agent
  - (c) No. 13 Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel;
    - a. Tank No. 1050: 2,268,000 gallon vertical floating roof jet kerosene tank;
    - b. Tank No. 1051: 2,268,000 gallon vertical fixed roof jet kerosene tank;
    - c. Tank No. 1052: 2,814,000 gallon vertical fixed roof jet kerosene tank;
    - d. Tank No. 1070: 9,156,000 gallon vertical fixed roof distillate breakout tank;

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(6)          ✓          Potable water treatment equipment, not including air stripping equipment; \*Water softeners and particulate filters only

(7)          ✓          Comfort air conditioning subject to requirements of Title VI of the Clean Air Act; \*Five (5) units for building comfort and one (1) small unit for office comfort

(8)          ✓          Laboratory fume hoods and vents; \*One (1) clean air exhaust fan in lab

(9) 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.   3      Oil/water separators \_\_\_\_\_

No.   1      Air Stripper for groundwater treatment \_\_\_\_\_

No.   1      Air Stripper for tank bottom water treatment (ARA Registration No. 013-0056-9-0083) \_\_\_\_\_

No.   2      Underground sumps \_\_\_\_\_

No.   1      Maintenance activities \_\_\_\_\_

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**BACKGROUND**

Colonial Pipeline Company - Dorsey Junction (Colonial) is a refined petroleum pipeline breakout station for Colonial's interstate transportation pipeline system. The facility tank farm includes breakout tanks for gasoline, distillates, additives, and other supporting equipment. The facility is located in Carroll County, Maryland (Air Quality Region III) which is within the Baltimore ozone non-attainment area. The primary Standard Industrial Classification (SIC) code for this facility is 4613.

Significant sources of air emissions at the facility include petroleum product breakout tanks and fugitive emissions from piping components such as valves, pumps, and connectors.

The following table summarizes the actual emissions from Colonial from 2013-2017 based on its Annual Emission Certification Reports:

**Table 1: Actual Emissions**

Year	NO <sub>x</sub> (TPY)	SO <sub>x</sub> (TPY)	PM <sub>10</sub> (TPY)	CO (TPY)	VOC (TPY)	Total HAP (TPY)
2013	0.005	0.000	0.935	0.001	71.6	0.670
2014	2.00	0.133	1.06	0.433	70.0	0.655
2015	0.228	0.016	0.949	0.049	70.6	0.212
2016	0.000	0.016	0.981	0.000	68.6	0.204
2017	0.134	0.029	0.942	0.029	65.8	0.237

The major source threshold for triggering Title V permitting requirements in Carroll County is 25 tons per year for VOC, 25 tons for NO<sub>x</sub>, and 100 tons per year for any other criteria pollutants and 10 tons for a single HAP or 25 tons per year for total HAPS. Since the actual VOC emissions from the facility are greater than the major source threshold, Colonial is required to obtain a Title V – Part 70 Operating Permit under COMAR 26.11.03.01.

Colonial's current Title V – Part 70 Operating Permit was issued on July 1, 2014 and expires on June 30, 2019. The renewal Title V – Part 70 Operating Permit will be issued to replace the current permit. The Permittee submitted their Part 70 permit renewal application to the Department on June 25, 2018. An administrative completeness review was conducted and the application was deemed administratively complete. An administrative completeness letter was sent on July 12, 2018 granting Colonial an application shield.

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**CAM APPLICABILITY**

Compliance Assurance Monitoring (CAM) 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; and
- (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.

None of the tanks at Colonial employ control devices as defined in 40 CFR §64.1. Although some insignificant activities at the facility are equipped with air strippers to minimize emissions of VOC from wastewater and groundwater treatment systems, the units do not have the potential to emit pre-control device emissions to be classified as a major source and are therefore not subject to CAM requirements. All of the emission units at Colonial either do not employ a control device or have pre-control emissions less than applicable major source thresholds, therefore CAM does not apply.

**APPLICABILITY OF FEDERAL REGULATIONS**

***NSPS Applicability***

Colonial operates three (3) volatile organic liquid storage tanks (Tanks 1040, 1041 and 5200) that are subject to the requirements of 40 CFR, Part 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984. Each tank has a capacity greater than 75 cubic meters and each tank was modified after July 23, 1984 to store volatile organic liquids subject to the NSPS requirements. The NSPS requirements of 40 CFR, Part 60, Subpart Kb are included in the Title V – Part 70 Operating Permit for these tanks.

***NESHAP Applicability***

Colonial is not a major source of HAP emissions and therefore not subject to the requirements of any major HAP source federal regulation in 40 CFR Part 63. Colonial is an area source of HAP emissions and is subject to the following area source NESHAP requirements:

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- 40 CFR, Part 63, Subpart BBBBBB - Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities. The compliance date for existing sources was January 10, 2011.

All applicable requirements of 40 CFR, Part 63, Subpart BBBBBB are included in the renewal permit. No other NESHAP requirements apply to Colonial at this time.

**GREENHOUSE GAS (GHG) EMISSIONS**

Colonial emits the following greenhouse gases (GHG) related to Clean Air Act requirements: carbon dioxide, methane, and nitrous oxide. These GHGs originate from emergency generators.

The facility has not triggered Prevention of Significant Deterioration (PSD) requirements for GHG emissions; therefore, there are no applicable GHG Clean Air Act requirements.

The following table summarizes the actual emissions from Colonial based on its Annual Emission Certification Reports:

**Table 2: Greenhouse Gases Emissions Summary**

<b>GHG</b>	<b>Conversion factor</b>	<b>2015 tpy CO<sub>2</sub>e</b>	<b>2016 tpy CO<sub>2</sub>e</b>	<b>2017 tpy CO<sub>2</sub>e</b>
Carbon dioxide CO <sub>2</sub>	1	9.191	0.197	7.05
Methane CH <sub>4</sub>	25	0.020	0.000	0.015
Nitrous Oxide N <sub>2</sub> O	300	0.000	0.000	0.000
<b>Total GHG CO<sub>2</sub>eq</b>		<b>9.693</b>	<b>0.197</b>	<b>7.425</b>

**CHANGES AND MODIFICATIONS TO THE PART 70 OPERATING PERMIT**

Since the prior Part 70 permit was issued the facility has modified the following tanks by replacing the internal floating roof: 1014 (2015) and 1011 (2016). The facility has also changed the engines in the insignificant activities section. A permit to construct was issued for all the internal floating roofs.

**EMISSION UNIT IDENTIFICATION**

Colonial has identified the following emission units as being subject to Title V permitting requirements and having applicable requirements.

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**Table 2: Emission Unit Identification**

<b>Emissions Unit Number</b>	<b>ARA Registration Number</b>	<b>Emissions Unit Name and Description</b>	<b>Date of Installation</b>
<b>Portable EG-1-8</b>	013-0056-9-0202	Group of eight (8) portable diesel emergency generators each rated at 2000 kilowatts to be brought on-site as needed for emergency purposes.	as needed for emergency purposes
<b>EU-D1000</b>	013-0056-9-0101	Tank D1000 – one (1) 4,000-gallon utility tank for bulk storage of red dye.	1996
<b>EU- Air Stripper</b>	013-0056-9-0083	One (1) air stripper for tank bottom water treatment. This emissions unit is included in the insignificant activities table.	1994
<b>Gasoline Breakout Tanks Subject to COMAR 26.11.13.03 and NESHAP 40 CFR 63 Subpart, BBBB</b>			
<b>EU-1010</b>	013-0056-9-0132	2,268,000 gallon gasoline breakout tank equipped with an internal floating roof.	1963 IFR replaced in 2012
<b>EU-1011</b>	013-0056-9-0132	5,544,000 gallon gasoline breakout tank equipped with an internal floating roof.	1963 IFR replaced in 2016
<b>EU-1012</b>	013-0056-9-0132	1,386,000 gallon gasoline breakout tank equipped with an internal floating roof.	1963 IFR replaced in 2010
<b>EU-1013</b>	013-0056-9-0132	1,386,000 gallon gasoline breakout tank equipped with an internal floating roof.	1963 IFR replaced in 2011
<b>EU-1014</b>	013-0056-9-0132	1,008,000 gallon gasoline breakout tank equipped with an internal floating roof.	1963 IFR replaced in 2015
<b>EU-1015</b>	013-0056-9-0132	1,386,000 gallon gasoline breakout tank equipped with an internal floating roof.	1963 IFR replaced in 2013
<b>EU-1016</b>	013-0056-9-0132	2,268,000 gallon, gasoline breakout tank equipped with an internal floating roof.	1963 IFR replaced in 2011
<b>EU-1030</b>	013-0056-9-0132	1,386,000 gallon gasoline breakout tank equipped with an internal floating roof.	1963 IFR replaced in 2013
<b>EU-1031</b>	013-0056-9-0132	1,806,000 gallon gasoline breakout tank equipped with an internal floating roof.	1963 IFR replaced in 2010
<b>EU-1032</b>	013-0056-9-0132	6,300,000 gallon gasoline breakout tank equipped with an internal floating roof.	1963 IFR replaced in 2009
<b>EU-1033</b>	013-0056-9-0132	3,360,000 gallon gasoline breakout tank equipped with an internal floating roof.	1963 IFR replaced

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			in 2009
<b>EU-1034</b>	013-0056-9-0132	1,806,000 gallon gasoline breakout tank equipped with an internal floating roof.	1963 IFR replaced in 2012
<b>Gasoline Breakout Tanks Subject to COMAR 26.11.13.03 and NSPS 40 CFR 60, Subpart Kb</b>			
<b>EU-1040</b>	013-0056-9-0132	1,008,000 gallon gasoline breakout tank equipped with an internal floating roof. Tank 1040 meets the requirements of NESHAP 40 CFR 63, Subpart BBBBBB by complying with NSPS 40 CFR 60, Subpart Kb.	1997
<b>EU-1041</b>	013-0056-9-0132	1,008,000 gallon gasoline breakout tank equipped with an internal floating roof. Tank 1041 meets the requirements of NESHAP 40 CFR 63, Subpart BBBBBB by complying with NSPS 40 CFR 60, Subpart Kb.	1997
<b>Transmix Breakout Tanks Subject to COMAR 26.11.13.03 Only</b>			
<b>EU-1060</b>	013-0056-9-0132	2,268,000 gallon transmix breakout tank equipped with an internal floating roof.	1963 IFR replaced in 2013
<b>EU-1061</b>	013-0056-9-0132	1,386,000 gallon transmix breakout tank equipped with an internal floating roof.	1963 IFR replaced in 2014
<b>Transmix/Gasoline Phase Separation Breakout Tank Subject to NSPS 40 CFR 60, Subpart Kb Only</b>			
<b>EU-5200</b>	013-0056-9-0132	21,000 gallon transmix/gasoline phase separation tank equipped with an internal floating roof.	2004 IFR replaced in 2013

Note: For the purposes of this permit, the term "gasoline" means any petroleum distillate or petroleum distillate/alcohol blend having a Reid vapor pressure of 27.6 kilopascals or greater, which is used as a fuel for internal combustion engines, as defined in 40 CFR §63.11100. The gasoline tanks listed above may periodically store distillate or transmix based on operational needs. Transmix tanks may also store distillate periodically based on operational needs.

**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,

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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**

**EU-1010-1016, EU-1030-1034, and EU-1040-1041 – Gasoline Breakout Tanks**  
**(ARA Registration No. 013-0056-9-0132).**

All of these tanks are large (greater than 40,000 gallons), closed top, gasoline storage tanks subject to the VOC requirements in COMAR 26.11.13 for large VOC storage tanks. All tanks were constructed prior to 1970, except Tanks Nos. 1040-1041, which were constructed in 1997.



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Tanks No. 1010-1016 and 1030-1034 are subject to the area source HAP requirements of 40 CFR 63, Subpart BBBB for gasoline storage tanks at bulk gasoline terminals. Tanks 1011 and 1014 had IFR replacements. IFR replacements do not qualify as a modification that triggers Kb applicability.

Tanks No. 1040-1041 trigger applicability of 40 CFR 60, Subpart Kb for volatile organic storage tanks and satisfy the requirements of 40 CFR 63, Subpart BBBB by complying with 40 CFR 60, Subpart Kb.

**Applicable Requirements**

**Control of VOC and HAP**

(1) **COMAR 26.11.13.03A(1)(a) and (b)** which require that:

- (a) Each tank's gauging and sampling devices be gas tight except when in use.
- (b) Each tank be equipped with one of the following properly installed, operating, and well maintained emission control systems:
  - (i) An internal floating roof equipped with a primary and secondary seal;
  - (ii) A pressure tank system that maintains a pressure at all times to prevent loss of vapors to the atmosphere; or
  - (iii) A vapor control system capable of collecting the vapors from the tank and disposing of the vapors to prevent their emission to the atmosphere.

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

- (a) There shall be no visible holes, tears, or other openings in the 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 and between the seal and other obstructions inside the tank (that is, ladder, roof supports) that are greater than 1/8 inch in width may not exceed 1.0 square inch per foot of tank diameter.

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(3) The Permittee shall comply with the following additional roof and seal requirements for each gasoline storage tank:

- (a) The IFR shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside the tank with a fixed roof. The IFR shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the tank 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) and §63.11087(a)]**

- (b) Each opening in a noncontact IFR 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)(iii) and §63.11087(a)]**

(4) The Permittee shall comply with the following additional roof and seal requirements for Tank 1040 and Tank 1041:

- (a) Each opening in the IFR except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
- (b) Automatic bleeder vents shall be equipped with a gasket and 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.
- (c) Rim space vents shall be equipped with a gasket and are to be set to open only when the IFR is not floating or at the manufacturer's recommended setting.
- (d) Each penetration of the IFR for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

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- (e) Each penetration of the IFR that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- (f) Each penetration of the IFR that allows for passage of a ladder shall have a gasketed sliding cover.

**[Authority: 40 CFR §60.112b(a)(1)(iv) through (ix)]**

Tanks 1040 and 1041 are subject to and in compliance with the control requirements of 40 CFR 60, Subpart Kb and are deemed in compliance with the gasoline storage tank requirements under 40 CFR 63, Subpart BBBBBB.

**[Authority: 40 CFR §63.11087(f)]**

***Compliance Demonstration for Control of VOC and HAP***

All tanks are equipped with an internal floating roof with primary and secondary seal to meet the roof and seal requirements of COMAR 26.11.13.03, 40 CFR 63, Subpart BBBBBB, and 40 CFR Subpart Kb, as applicable. The Permittee is required to conduct annual visual inspections of each tank's gauging and sampling devices, roof, and seals and maintain records of the inspections and any actions taken or repairs made to maintain compliance with all applicable requirements. The Permittee must also conduct top-side in service internal inspections of the tanks in accordance with the U.S. EPA approved alternate monitoring procedure at least once every 10 years. The Permittee is required to notify the Department prior to conducting an internal tank inspection and submit semiannual reports.

In the Notification of Compliance Status required under 40 CFR 63, Subpart BBBBBB, the Permittee identified Tank Nos. 1040 and 1041 as tanks that are subject to, and in compliance with, 40 CFR 60, Subpart Kb. There are no additional compliance requirements under 40 CFR 63, Subpart BBBBBB as long as the tanks are subject to, and in compliance with 40 CFR 60, Subpart Kb.

***Rationale for Periodic Monitoring Strategy for Control of VOC and HAP***

COMAR 26.11.13.03, 40 CFR 63, Subpart BBBBBB, and 40 CFR Subpart Kb 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.

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**Emission Unit EU-5200: Transmix/Gasoline Phase Separation Tank (ARA Registration No. 013-0056-9-0132)**

EU 5200 is a 21,000 gallon transmix/gasoline phase separation tank equipped with a full-contact internal floating roof with a primary and secondary seal. Tank 5200 is subject to the NSPS requirements of 40 CFR 60, Subpart Kb because its capacity is greater than 19,813 gallons and it was installed in 2004, after the applicability dates of the regulation.

Tank 5200 is not subject to COMAR 26.11.13.03 because the regulations apply only to large storage tanks (40,000 gallon capacity or greater). COMAR 26.11.13.04C for small gasoline storage tanks and 40 CFR 63 Subpart BBBBBB for gasoline storage tanks also do not apply because Tank 5200 stores a transmix/gasoline phase separation that is not considered gasoline.

**Applicable Requirements**

**Control of VOC**

40 CFR 60.112b(a)(1) which requires the Permittee to equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:

- (1) The tank shall be equipped with a fixed roof in combination with an IFR. The IFR shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside the tank with a fixed roof. The IFR shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the tank 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.

- (2) The tank shall be equipped with an IFR with two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the tank and the edge of the IFR. The lower seal may be vapor-mounted, but both must be continuous.
- (3) Each opening in a noncontact IFR except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- (4) Each opening in the IFR except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be

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maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

- (5) Automatic bleeder vents shall be equipped with a gasket and 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.
- (6) Rim space vents shall be equipped with a gasket and are to be set to open only when the IFR is not floating or at the manufacturer's recommended setting.
- (7) Each penetration of the IFR for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
- (8) Each penetration of the IFR that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- (9) Each penetration of the IFR that allows for passage of a ladder shall have a gasketed sliding cover.

**[Authority: 40 CFR §60.112b(a)(1)(i) through (ix)]**

Operating Limitation

The Permittee shall apply for and obtain a permit to construct from the Department prior to storing gasoline in Tank 5200. **[Authority: ARA premises wide Permit to Construct issued on February 23, 2016]**

***Compliance Demonstration for Control of VOC and Operating Limitation***

Tank No. 5200 is equipped with an internal floating roof with primary and secondary seal to meet the roof and seal requirements of 40 CFR 60, Subpart Kb. The Permittee is required to conduct annual visual inspections of the roof and seal and maintain records of the inspections and any actions taken or repairs made to maintain compliance with all applicable requirements. The Permittee must also conduct an internal inspection within 10 years from the date of the last internal inspection.

The Permittee must also keep records of the amounts, types, and composition of all materials stored in the tank to ensure that the tank does not store gasoline.

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***Rationale for Periodic Monitoring Strategy for Control of VOC and Operating Limitation***

40 CFR 60, Subpart Kb outlines 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 records of materials stored to ensure that gasoline is not stored in the tank. These inspections and records provide the appropriate amount of periodic monitoring required for compliance.

**Emission Units EU 1060 and EU 1061: Transmix Breakout Tanks (ARA Registration No. 013-0056-9-0132).**

EU 1060 and 1061 are 2,268,000 gallon and 1,386,000 gallon, respectively, above ground transmix breakout tanks equipped with both geodesic dome roofs and aluminum internal floating roofs equipped with primary and secondary seals. These emission units are large (greater than 40,000 gallons) tanks. These tanks were constructed prior to 1973 and have not undergone any major modifications or reconstructions as defined in 40 CFR Part 60.14, and 60.15. The tanks are currently not subject to the NSPS requirements of 40 CFR 60, Subparts K, Ka or Kb because they were installed prior to the applicability dates of those regulations and have not undergone any major modifications or reconstructions that would trigger NSPS Subparts K, Ka, or Kb. Tanks No. 1060 and 1061 are not subject to 40 CFR 63 Subpart BBBB for gasoline storage tanks because they do not store gasoline.

**Applicable Requirements**

**Control of VOC**

(1) **COMAR 26.11.13.03A(1)(a) and (b)** which require that:

- (a) Each tank's gauging and sampling devices be gas tight except when in use.
- (b) Each tank be equipped with one of the following properly installed, operating, and well maintained emission control systems:
  - (i) An internal floating roof equipped with a primary and secondary seal;
  - (ii) A pressure tank system that maintains a pressure at all times to prevent loss of vapors to the atmosphere; or

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

- (2) **COMAR 26.11.13.03A(2)** which requires the Permittee to meet the following seal requirements:
- (a) There shall be no visible holes, tears, or other openings in the 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 and between the seal and other obstructions inside the tank (that is, ladder, roof supports) that are greater than 1/8 inch in width may not exceed 1.0 square inch per foot of tank diameter.

Operational Limitation:

The Permittee shall apply for and obtain a permit to construct from the Department prior to storing gasoline in Tank 1060 or Tank 1061.

***Compliance Demonstration for Control of VOC and Operating Limitation***

Tank Nos. 1060 and 1061 are each equipped with an internal floating roof with primary and secondary seal to meet the roof and seal requirements of COMAR 26.11.13.03. The Permittee is required to conduct annual visual inspections of each tank's gauging and sampling devices, roof, and seals and maintain records of the inspections and any actions taken or repairs made to maintain compliance with all applicable requirements. The Permittee must also conduct top-side in service internal inspections of the tanks in accordance with the U.S. EPA approved alternate monitoring procedure at least once every 10 years. The Permittee must also keep records of the amounts, types, and composition of all materials stored in the tanks to ensure that the tanks do not store gasoline.

***Rationale for Periodic Monitoring Strategy for Control of VOC and Operating Limitation***

COMAR 26.11.13.03 outlines 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 and records of materials stored to ensure that gasoline is not stored in the tanks. These inspections and records provide the appropriate amount periodic monitoring required for compliance.

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**Emission Unit: EU-D1000 - Utility Tank for Bulk Storage of Red Dye (ARA Registration No. 013-0056-9-0101)**

EU-D1000 is a 4,000-gallon utility tank for bulk storage of red dye. The tank was installed in 1996. Due to the tank's capacity of less than 19,813 gallons, it is not subject to the requirements of 40 CFR 60, Subpart Kb. Tank D1000 is not subject to COMAR 26.11.13.03 because the regulations apply only to large storage tanks (40,000 gallon capacity or greater). COMAR 26.11.13.04C for small gasoline storage tanks and 40 CFR 63 Subpart BBBB for gasoline storage tanks also does not apply because Tank D1000 stores additive that is not considered gasoline.

**Applicable Requirements**

COMAR 26.11.06.06 requires that the Permittee limit emissions of VOC to not more than 20 pounds per day unless VOC emissions are reduced by 85 percent or more overall.

**Compliance Demonstration for Control of VOC**

To demonstrate compliance with the requirements of COMAR 26.11.06.06 the Permittee shall keep monthly records to document amounts, types, and composition of all materials loaded into the tank.

**Rationale for Periodic Monitoring Strategy for Control of VOC**

Maintaining records of the amounts, types, and composition of all materials loaded into the tank can be used to support the VOC emissions calculations and are sufficient to demonstrate compliance with the requirements for tank D1000. No additional periodic monitoring is necessary.

**Emission Unit: EG-1-8 – (8) Eight Portable Diesel Emergency Generators Each Rated at 2000 kilowatts to be Brought On-site as Needed for Emergency Purposes (ARA Registration No. 013-0056-9-0202).**

**Applicable Requirements:**

**Visible Emissions and Opacity Limitations**

**COMAR 26.11.09.05E(2)**, which states that “a person may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.”

**COMAR 26.11.09.05E(3)**, which states that “a person may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.”



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Exceptions. **COMAR 26.11.09.05E(4)** establishes the following:

- (1) Section E(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system
- (2) Section E(2) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods: (i) Engines that are idled continuously when not in service: 30 minutes; and (ii) All other engines: 15 minutes.
- (3) Section E(2) and (3) do not apply while maintenance, repair, or testing is being performed by qualified mechanics.

***Compliance Demonstration for Visible Emissions and Opacity Limitations and Rationale for Periodic Monitoring Strategy***

A properly operated and maintained engine of this size should not cause visible emissions in excess of the applicable standards. The Permittee shall operate and maintain the stationary internal combustion engine in a manner to prevent visible emissions. The Permittee shall maintain records of all maintenance/repairs performed and make them available to the Department upon request. The Permittee shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations."

**[Authority: COMAR 26.11.03.06C]**

Control of Sulfur Oxides

**COMAR 26.11.09.07A(2)(b)** which states that the Permittee shall not burn any distillate fuel oil with a sulfur content by weight greater than 0.3%.

***Compliance Demonstration for Control of Sulfur Oxides and Rationale for Periodic Monitoring Strategy***

The Permittee shall obtain a certification from the fuel supplier indicating that the oil complies with the limitation on the sulfur content of fuel oil. The Permittee shall keep records of fuel supplier certifications of sulfur content in fuel and submit the records to the Department upon request. Fuel supplier certifications are sufficient to demonstrate compliance with all applicable fuel sulfur limit. No additional monitoring is required.

Operational Limitations

**40 CFR §1068.30** - The engine must be portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Indicia of portability include, but is not limited to, wheels, skids, carrying handles, dolly, trailer or platform. Each engine may not remain on site for more than 12 consecutive months.

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***Compliance Demonstration and Rationale for Periodic Monitoring Strategy***

The Permittee must maintain the beginning and end dates of each period that the engine is brought on site for operation. The Permittee is also required to maintain an operating log for the engine including the dates and hours the engine is operated and the reason the engine was in operation during that time. These records are sufficient to demonstrate compliance.

**EU-General – General Facility Wide Requirements**

Colonial 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. In addition, without operational and emissions limits, Colonial could potentially emit major source levels of HAP and NOx. The throughput limits establish federally enforceable requirements that limit the potential facility wide HAP and NOx emissions.

**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.

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

- (1) Premises wide HAP emissions shall be less than the following limits in any rolling 12-month period:
  - (a) 10 tons for any individual HAP; and
  - (b) 25 tons for the total combination of HAP.

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- (2) Premises wide throughputs of gasoline and distillate shall be less than the following limits in any rolling 12-month period unless the Permittee can demonstrate compliance with premises wide HAP limits at higher throughputs:
- (a) 2,562,840,000 gallons of gasoline (refers to gasoline grades that include conventional, re-formulated and blend stock gasoline, and gasoline-distillate mixtures (e.g., *transmix*)); and
  - (b) 3,055,297,000 gallons of distillates (includes fuel oils and kerosenes); and
  - (c) 104,000 gallons of additives.

Operational and Emissions Limitations to Preclude Applicability of Major Source NOx Requirements

Premises wide NOx emissions shall be less than 25 tons in any rolling 12-month period.

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

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

***Rationale for Periodic Monitoring Strategy for Operational and Emissions Limitations to Preclude Applicability of Major Source HAP and NOx Requirements***

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

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**COMPLIANCE SCHEDULE**

Colonial is currently in compliance with all applicable air quality regulations

**TITLE IV – ACID RAIN**

Not Applicable

**TITLE VI – OZONE DEPLETING SUBSTANCES**

Colonial is not subject to Title VI requirements.

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**SECTION 112(r) – ACCIDENTAL RELEASE**

Colonial is not subject to the requirements of Section 112(r).

**PERMIT SHIELD**

Colonial did not request a permit shield.

**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) No. 5 Stationary internal combustion engines with an output less than 500 brake horsepower (373 kilowatts) and which are not used to generate electricity for sale or for peak or load shaving;

The one (1) 162 hp emergency generator, one (1) 132 hp emergency generator, and three (3) 399 hp emergency fire pump engines are subject to the following requirements:

- (a) COMAR 26.11.09.05E(2), Emissions During Idle Mode: The Permittee may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.
- (b) COMAR 26.11.09.05E(3), Emissions During Operating Mode: The Permittee may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.
- (c) Exceptions:
  - (i) COMAR 26.11.09.05E(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.
  - (ii) COMAR 26.11.09.05E(2) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods:

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- (a) Engines that are idled continuously when not in service: 30 minutes
- (b) all other engines: 15 minutes.
  
- (iii) COMAR 26.11.09.05E(2) & (3) do not apply while maintenance, repair or testing is being performed by qualified mechanics.
- (d) For the 162 hp emergency generator, 40 CFR 63, Subpart ZZZZ which states that the Permittee must:
  - (i) Change oil and filter every 500 hours of operation or annually, whichever comes first;
  - (ii) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;
  - (iii) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary;
  - (iv) operate and maintain the engine and keep records as specified in Subpart ZZZZ; and
  - (v) keep records of the hours of operation of the engine as recorded through a non-resettable hour meter.
  
- (e) For one (1) 132 hp emergency generator, and three (3) 399 hp emergency fire pump engines, 40 CFR 63, Subpart IIII which states that the Permittee must:
  - (i) purchase an engine certified to the emission standards in 40 CFR §60.4205(b) and (c) for the same model year and maximum engine power;
  - (ii) install and configure the engine according to the manufacturer's emission-related specifications;
  - (iii) operate and maintain the diesel engine that achieves the emissions standards as required by 40 CFR §60.4205 for emergency engines according to the manufacturer's emissions related written instructions over the entire life of the engine;

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- (iv) change those settings that are permitted by the manufacturer;
  - (v) meet the requirements of 40 CFR Parts 89, 94, and/or 1068, as applicable;
  - (vi) use diesel fuel in the engine that meets the requirements of 40 CFR §80.510(b); and
  - (vii) meet the requirements of 40 CFR 63, Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart IIII.
- (2)  Space heaters utilizing direct heat transfer and used solely for comfort heat;
- (3) No. 20 Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less; \*Small containers of tank cleaning solutions only – quantity varies often; two (2) 55-gallon drums of transmix
- (4) Containers, reservoirs, or tanks used exclusively for:
- (a)  Storage of butane, propane, or liquefied petroleum, or natural gas;
  - (b) No. 1 Unheated storage of VOC with an initial boiling point of 300 °F (149 °C) or greater; \*1200-gallon tank for storage of drag reducing agent
  - (c) No. 13 Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel;
    - a. Tank No. 1050: 2,268,000 gallon vertical floating roof jet kerosene tank;
    - b. Tank No. 1051: 2,268,000 gallon vertical fixed roof jet kerosene tank;
    - c. Tank No. 1052: 2,814,000 gallon vertical fixed roof jet kerosene tank;

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- d. Tank No. 1070: 9,156,000 gallon vertical fixed roof distillate breakout tank;
- e. Tank No. 1071: 5,040,000 gallon vertical fixed roof distillate breakout tank;
- f. Tank No. 1072: 3,360,000 gallon vertical fixed roof distillate breakout tank;
- g. Tank No. 1073: 4,032,000 gallon vertical fixed roof distillate breakout tank;
- h. Tank No. 1074: 1,806,000 gallon vertical fixed roof jet kerosene tank;
- i. Tank No. 1075: 2,268,000 gallon vertical fixed roof jet kerosene tank;
- j. Tank No. 1076: 4,032,000 gallon vertical fixed roof jet kerosene tank;
- k. Tank No. 1077: 3,360,000 gallon vertical fixed roof distillate breakout tank;
- l. Tank No. 1080: 1,015,350 gallon vertical fixed roof distillate breakout tank; and
- m. Tank No. 1081: 1,015,350 gallon vertical fixed roof distillate breakout tank.

(d) No. 20 The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less;

- (5)  First aid and emergency medical care provided at the facility, including related activities such as sterilization and

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medicine preparation used in support of a manufacturing or production process; \*First Aid kits only

- (6)  Potable water treatment equipment, not including air stripping equipment; \*Water softeners and particulate filters only
- (7)  Comfort air conditioning subject to requirements of Title VI of the Clean Air Act; \*Five (5) units for building comfort and one (1) small unit for office comfort
- (8)  Laboratory fume hoods and vents; \*One (1) clean air exhaust fan in lab
- (9) 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.   3   Oil/water separators\_\_\_\_\_

No.   1   Air Stripper for groundwater treatment\_\_\_\_\_

No.   1   Air Stripper for tank bottom water treatment (ARA Registration No. 013-0056-9-0083)\_\_\_\_\_

No.   2   Underground sumps\_\_\_\_\_

No.   1   Maintenance activities\_\_\_\_\_



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**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.

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.