AIR AND RADIATION ADMINISTRATION
DRAFT PART 70 OPERATING PERMIT

DOCKET # 24-510-0119

COMPANY: Citgo/Sunoco Baltimore Terminal

LOCATION: 2201 Southport Ave.
Baltimore, MD 21226

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MARYLAND DEPARTMENT OF THE ENVIRONMENT
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AIR QUALITY PERMITS PROGRAM

TITLE V – PART 70 OPERATING PERMIT PROGRAM OVERVIEW

Title V of the Clean Air Act (amended) requires each state to implement a federally enforceable operating permit program for major sources of air pollution. This program, the Part 70 Permit Program, also known as the Title V Permit Program, is designed to provide a comprehensive administrative document (a Part 70 Operating Permit) that identifies all air emissions sources at a given facility and the federal air quality regulations applicable to those sources. The permit establishes the methodology by which the owner/operator will demonstrate compliance, and includes testing, monitoring, record-keeping, and reporting requirements for each emissions source.

A Part 70 Operating Permit does not authorize new construction, and does not add any new emissions limitations, standards, or work practices on an affected facility. There may, however, be additional testing, record keeping, monitoring, and reporting requirements. A Part 70 Operating Permit is a five-year renewable permit. A responsible official for each facility subject to a Part 70 Operating Permit is required to annually certify compliance with each applicable requirement for that facility.

When an application for a Part 70 Operating Permit is received, the Department will complete a technical review of the application and will prepare a draft Part 70 Operating Permit and Fact Sheet. The Fact Sheet will explain the basis and technical analysis used by the Department to develop the federally enforceable permit conditions, including the required testing, monitoring, record keeping, and reporting provisions for each emissions unit at the permitted facility. The Fact Sheet will also include a description of the facility operations and the current compliance status with applicable requirements. If there are any discrepancies between the Part 70 Operating Permit application and the draft permit, the Fact Sheet will contain a discussion of the inconsistencies and the final resolution.

Public Participation Process

The Part 70 Operating Permit Program provides the public, adjacent states, and EPA the opportunity to review and submit comments on draft permits. The public may also request a public hearing on the draft permit.

The purpose of a public hearing is to give interested parties the opportunity to submit comments for the record which are germane to the draft federally enforceable permit conditions. Comments made at the hearing, or in writing to the Department during the comment period, should address errors and deficiencies in the permit such as unidentified emissions units, incorrect or deficient regulation citation, deficient record keeping, monitoring, reporting or testing requirements and unresolved compliance issues. After the public comment period has closed, the Department will review the formal testimony as part of the final review and prepare a Response to Comments document which will be sent to the EPA along with the draft Part 70 Operating Permit and Fact Sheet.

Testimony on state-only requirements will be kept on file at the Department as part of the formal record, however, state-only rules and regulations are not federally enforceable, and therefore are not within the scope of the EPA review. The Department will keep a record of the identity of the commenters, their statements, a summary of the issues raised during the public comment period, and the Response to Comments document for at least five years.

Citizen Petition to EPA to Object to Permit Issuance

Interested parties may petition the EPA to object to the Part 70 Permit if the EPA has not already objected, within 60 days after the 45-day EPA review period has ended. The petition period will be posted on the EPA website. The EPA will only consider objections to the federally enforceable provisions of the draft permit which were raised with reasonable specificity during the public comment period, unless: (1) the petitioner demonstrates that it was impractical to raise the objections within the public comment period, or (2) the grounds for the objection arose after the comment period. If the EPA agrees with the petition, the Department will reopen, revise, or revoke the permit as determined.

Applicant Objection to Permit Issuance and Recourse

If the applicant objects to the federally enforceable permit conditions contained in the issued Part 70 Operating Permit, the applicant has 15 days from receipt of the issued permit to request a contested case hearing. More information on that can be found in 40 CFR, Part 70, and COMAR 26.11.03.11.

MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION

NOTICE OF INTENT TO ISSUE PART 70 OPERATING PERMIT, OPPORTUNITY TO SUBMIT WRITTEN COMMENTS OR TO REQUEST A PUBLIC HEARING

The Department of the Environment, Air and Radiation Administration (ARA) has completed its review of the application for a renewal Part 70 Operating Permit submitted by the Citgo/Sunoco Baltimore Terminal. The facility includes storage tanks for gasoline, ethanol and distillates, and a loading rack.

The applicant is represented by:

Mr. Roger Bullock, Terminal Manager
Citgo/Sunoco Baltimore Terminal
2201 Southport Ave.
Baltimore, MD 21226

The Department has prepared a draft Part 70 Operating Permit for review and is now ready to receive public comment. A docket containing the application, draft permit, and supporting documentation is available for review on the Department's website, under the Air Quality Permitting Page's Title V link under "Draft Title V Permits" and may be viewed here:

https://tinyurl.com/DraftTitleV

Interested persons may submit written comments or request a public hearing on the draft permit. Written comments must be received by the Department no later than 30 days from the date of this notice. Requests for a public hearing must be submitted in writing and must also be received by the Department no later than 30 days from the date of this notice.

Comments and requests for a public hearing will be accepted by the Department if they raise issues of law or material fact regarding applicable requirements of Title V of the Clean Air Act, and/or regulations implementing the Title V Program in Maryland found in COMAR.

A Request for public hearing shall include the following:

1) The name, mailing address, and telephone number of the person making the request;

2) The names and addresses of any other persons for whom the person making the request if representing; and

3) The reason why a hearing is requested, including the air quality concern that forms the basis for the request and how this concern relates to the person making the request.

All written comments and requests for a public hearing should be directed to the attention of Ms. Shannon Heafey via email at Shannon.heafey@maryland.gov or by post at Air Quality Permits Program, Air and Radiation Administration, 1800 Washington Boulevard Suite 720, Baltimore, Maryland 21230-1720. Further information may be obtained by calling Ms. Shannon Heafey at (410) 537-4433.

CITGO PETROLEUM CORPORATION
CITGO/SUNOCO PETROLEUM TERMINAL
2201 SOUTHPORT AVENUE
BALTIMORE, MARYLAND
PART 70 OPERATING PERMIT NO. 510-0119
FACT SHEET

BACKGROUND

CITGO/Sunoco Petroleum Terminal owns and operates a bulk petroleum marketing terminal located at 2201 Southport Avenue in Baltimore, Maryland. The terminal is located in Baltimore City in Maryland Air Quality Region III. The primary SIC code for this facility is 5171.

Gasoline, ethanol, and distillate products are transferred through the truck loading rack and barge dock. Gasoline, ethanol, butane, and fuel additives are received by tanker truck, barge, pipeline, or rail car. The petroleum products are stored in large aboveground storage tanks. Petroleum products are bottom loaded into tank trucks from a six-lane loading rack. All vapors from the loading operations are piped to a two-stage, propane-fired John Zink Vapor Combustion Unit.

The following table summarizes the actual emissions from the CITGO/Sunoco Petroleum Terminal based on its Annual Emission Certification Reports:

Table 1: Actual Emissions

Year	NO_x (TPY)	SO_x (TPY)	PM_{10} (TPY)	CO (TPY)	VOC (TPY)	Total HAP (TPY)
2022	8.79	0.0	0.0	21.98	51.19	<1.0
2021	6.16	0.0	0.0	15.40	43.65	<1.0
2020	5.91	0.0	0.0	14.76	43.18	<1.0
2019	5.66	0.0	0.0	14.05	49.83	<1.0
2018	6.28	0.0	0.0	15.88	53.93	<1.0

The major source threshold for triggering Title V permitting requirements in Baltimore City is 25 tons per year for VOC, 25 tons for NOx, 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, the CITGO/Sunoco Petroleum Terminal is required to obtain a Title V – Part 70 Operating Permit under COMAR 26.11.03.01.

The CITGO/Sunoco Petroleum Terminal's current Title V – Part 70 Operating Permit was issued on September 1, 2019, and expires on August 31, 2024. This renewal Title V – Part 70 Operating Permit will be issued to replace the current permit. The facility's Title V – Part 70 Operating Permit renewal application was received by the Department on August 29, 2023. An administrative completeness review was conducted, and the application was deemed

administratively complete. An administrative completeness letter was sent on November 8, 2023, granting the CITGO/Sunoco Petroleum Terminal an application shield.

CHANGES AND MODIFICATIONS TO THE PART 70 OPERATING PERMIT

Since the prior Title V – Part 70 Operating Permit was issued the co-owner has changed from Zenith to Sunoco Energy Terminals.

The permit has also been updated to include the incorporation of changes to 40 CFR 60, Subpart Kb. A revision of the rule was issued on January 19, 2021. This revision allows in-service inspections of internal floating roof tanks. The changes were incorporated into Table IV-2, Condition 2.3 A (2) and (3) (c).

NSPS AND NESHAP APPLICABILITY

NSPS Applicability

The CITGO/Sunoco Petroleum Terminal operates two (2) volatile organic liquid storage tanks (Tank No. 11 for ethanol storage and Tank No. 15 for gasoline and interface storage) 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 constructed or modified after July 23, 1984.

Tanks No. 3 and 9 are subject to 40 CFR Part 63 Subpart BBBBBB, described below, but comply by meeting the requirements of 40 CFR Part 60, Subpart Kb. The NSPS requirements of 40 CFR, Part 60, Subpart Kb are included in the Title V – Part 70 Operating Permit for these tanks.

The loading rack at the CITGO/Sunoco Petroleum Terminal is subject to the requirements of 40 CFR, Part 60, Subpart XX – Standards of Performance for Bulk Gasoline Terminals. Subpart XX applies to loading racks constructed or modified after December 17, 1980. The loading rack was reconstructed in 1996. The NSPS requirements of 40 CFR, Part 60, Subpart XX are included in the Title V – Part 70 Operating Permit for the loading rack.

No other NSPS regulations apply to the CITGO/Sunoco Petroleum Terminal at this time.

NESHAP Applicability

The CITGO/Sunoco Petroleum Terminal is a true minor source with respect to HAP emissions. As a true minor source of HAP emissions, the CITGO/Sunoco Petroleum Terminal is not subject to the major source NESHAP requirements of 40 CFR, Part 63, Subpart R for Gasoline Distribution Facilities.

The CITGO/Sunoco Petroleum Terminal is subject to the requirements of the area source NESHAP requirements of 40 CFR, Part 63, Subpart BBBBBB for Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities. CITGO/Sunoco Petroleum Terminal is considered an existing source with respect to 40 CFR, Part 63, Subpart BBBBBB because it was not constructed or reconstructed, as defined in 40 CFR, Part 63, after November 9, 2006. The company sent in its Notification of Compliance Status form on January 6, 2011. The NESHAP requirements of 40 CFR, Part 63, Subpart BBBBBB are included in the Title V – Part 70 Operating Permit.

No other NESHAP regulations apply to the CITGO/Sunoco Petroleum Terminal at this time.

CAM APPLICABILITY

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

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

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

The storage vessels at the CITGO/Sunoco Petroleum Terminal do not employ control devices as defined in 40 CFR §64.1. CAM requirements do not apply to the storage vessels.

The loading rack at the CITGO/Sunoco Petroleum Terminal uses a John Zink Vapor Combustion Unit to meet federally enforceable emission limits (COMAR 26.11.13.04A(1)(a) and 40 CFR 60.502(a) and (b)). The VOC emissions from the loading rack, pre-control, would be greater than the major source threshold of

25 tons per year. The loading rack is not subject to major source MACT requirements and is not otherwise exempt from CAM. CAM requirements apply to the John Zink Vapor Combustion Unit and a CAM plan for the John Zink Vapor Combustion Unit is included in Table IV-CAM of the renewal Title V – Part 70 Operating Permit.

GREENHOUSE GAS (GHG) EMISSIONS

CITGO/SUNOCO Petroleum Terminal emits the following greenhouse gases (GHG) related to Clean Air Act requirements: carbon dioxide, methane, and nitrous oxide. These GHG originates from the fuel burning equipment at the premises.

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 GHG emissions from the CITGO/Sunoco Petroleum Terminal based on its Annual Emission Certification Reports:

Table 2: Greenhouse Gases Emissions Summary

GHG	**Conversion factor**	**2020** tpy CO_2e	**2021** tpy CO_2e	**2022** tpy CO_2e
Carbon dioxide CO_2	1	2,137.44	1,570.4	2,081.9
Methane CH_4	25	0	0	0
Nitrous Oxide N_2O	300	0	0	0
Total GHG CO_{2eq}		**2,137.44**	**1,570.4**	**2,081.9**

COMPLIANCE UPDATE

A full compliance evaluation of the facility was conducted on January 17, 2023. This evaluation included the review of all required recordkeeping. Notably, stack testing was completed within the required timeframe and the results were in compliance with the standards. The full compliance evaluation report states that tank inspections and maintenance were performed accordingly. A back pressure reading of the truck loading rack was also taken during the inspection and all trucks at the terminal were inspected for compliance with the vapor tightness test. No violations were observed at the time of the evaluation and a review of

the records over the last 5 years indicates that the Air and Radiation Administration has not issued any Notices of Violation or taken any enforcement action against the company.

In addition, recent semi-annual compliance reports note that no deviations from permit conditions have occurred.

EMISSION UNIT IDENTIFICATION

CITGO/Sunoco Petroleum Terminal has identified the following emission units as being subject to Title V permitting requirements and having applicable requirements:

Table 3: Emission Unit Identification

Emissions Unit Number	MDE Registration Number	Emissions Unit Name and Description	Date of Installation
EU-1	510-0119-9-0093	Tank No. 1 - 3,854,382-gallon (91,771-barrel) gasoline, ethanol, and distillate storage tank equipped with an internal floating roof with mechanical shoe seal.	1954
EU-2		Tank No. 2 – 2,646,756-gallon (63,018-barrel) gasoline, ethanol, and distillate storage tank equipped with an internal floating roof with mechanical shoe seal.	1971
EU-3		Tank No. 3 – 982,380-gallon (23,390-barrel) gasoline, ethanol, and distillate storage tank equipped with an internal floating roof with mechanical shoe seal.	1955
EU-5		Tank No. 5 – 1,683,360-gallon (40,080-barrel) gasoline, ethanol, and distillate storage tank equipped with an internal floating roof with mechanical shoe seal.	1960
EU-6		Tank No. 6 – 288,750-gallon (6,875-barrel) additive storage tank equipped with an internal floating roof with mechanical shoe seal.	1938, reconstructed in 1992
EU-9		Tank No. 9 – 2,516,850-gallon (59,925-barrel) gasoline, ethanol, and distillate storage tank equipped with an internal floating roof with mechanical shoe seal.	1960

Emissions Unit Number	MDE Registration Number	Emissions Unit Name and Description	Date of Installation
EU-10		Tank No. 10 – 3,441,606-gallon (81,943-barrel) gasoline and ethanol storage tank equipped with an internal floating roof with mechanical shoe seal.	1958
EU-11		Tank No. 11 – 7,363,188-gallon (175,314-barrel) ethanol and distillate storage tank equipped with an internal floating roof with mechanical shoe seal.	1959, modified in 2006 for ethanol storage
EU-15		Tank No. 15 – 98,280-gallon (2,340-barrel) gasoline and interface storage tank equipped with an internal floating roof with double wiper seal.	Reconstructed in 1996
EU-19		Tank No. 19 – 10,000-gallon additive horizontal storage tank equipped with fixed roof.	1992
EU-23		Tank No. 23 – 10,500-gallon additive horizontal storage tank equipped with fixed roof.	1993
EU-LR		Six-lane loading rack equipped with a 10 milligrams per liter John Zink Vapor Combustion Unit.	Reconstructed in 1996

AN OVERVIEW OF THE PART 70 PERMIT

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

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

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

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

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

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

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

REGULATORY REVIEW/TECHNICAL REVIEW/COMPLIANCE METHODOLOGY

EU-1: Tank No. 1 - 3,854,382-gallon (91,771-barrel) gasoline, ethanol, and distillate storage tank equipped with an internal floating roof with mechanical shoe seal.

EU-2: Tank No. 2 – 2,646,756-gallon (63,018-barrel) gasoline, ethanol, and distillate storage tank equipped with an internal floating roof with mechanical shoe seal.

EU-5: Tank No. 5 – 1,683,360-gallon (40,080-barrel) gasoline, ethanol, and distillate storage tank equipped with an internal floating roof with mechanical shoe seal.

These are large (greater than 40,000 gallons) closed top, gasoline and ethanol storage tanks registered under ARA Registration No. 510-0119-9-0093. All of the tanks were constructed prior to 1973 and have not been modified or reconstructed in a manner that would trigger applicability of 40 CFR 60, Subpart Kb for volatile organic storage tanks. The tanks store gasoline and are subject to the NESHAP requirements for gasoline storage tanks under 40 CFR 63, Subpart BBBBBB.

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 or equivalent mechanical shoe 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.

(3) **40 CFR 63, Subpart BBBBBB** which requires the Permittee to meet emission limits and management practices for gasoline storage tanks at bulk gasoline terminals.

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

(i) The internal floating roof shall be equipped with a liquid-mounted seal or a mechanical shoe seal.

(ii) The floating roof shall float on the stored liquid surface at all times, except when the floating roof is supported by its leg supports or other support devices (e.g., hangers from the fixed roof).

(iii) When the storage vessel is storing liquid, but the liquid depth is insufficient to float the floating roof, the process of filling to the point of refloating the floating roof shall be continuous and shall be performed as soon as practical.

(iv) Each cover over an opening in the floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall be closed at all times, except when the cover must be open for access.

(v) Each automatic bleeder vent (vacuum breaker vent) and rim space vent shall be closed at all times, except when required to be open to relieve excess pressure or vacuum, in accordance with the manufacturer's design.

(vi) Each unslotted guide pole cap shall be closed at all times except when gauging the liquid level or taking liquid samples.

[Authority: 40 CFR §63.1063(a)(1)(i)(A) and (B), §63.1063(b), §63.11087(a) and (b) and Table 1, Option 2(d) of 40 CFR 63, Subpart BBBBBB]

Compliance Demonstration for Control of VOC and HAP

Each tank is equipped with an internal floating roof with mechanical shoe seals to meet the roof and seal requirements of COMAR 26.11.13.03 and 40 CFR 63, Subpart BBBBBB. 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 an internal inspection within 10 years from the date of the last internal inspection. The Permittee is required to notify the Department prior to conducting an internal tank inspection and submit semiannual reports.

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

EU-3: Tank No. 3 – 982,380-gallon (23,390-barrel) gasoline, ethanol, and distillate storage tank equipped with an internal floating roof with mechanical shoe seal.

EU-9: Tank No. 9 – 2,516,850-gallon (59,925-barrel) gasoline, ethanol, and distillate storage tank equipped with an internal floating roof with mechanical shoe seal.

EU-10: Tank No. 10 – 3,441,606-gallon (81,943-barrel) gasoline and ethanol storage tank equipped with an internal floating roof with mechanical shoe seal.

EU-11: Tank No. 11 – 7,363,188-gallon (175,314-barrel) ethanol and distillate storage tank equipped with an internal floating roof with mechanical shoe seal.

EU-15: Tank No. 15 – 98,280-gallon (2,340-barrel) gasoline and interface storage tank equipped with an internal floating roof with double wiper seal.

All of these tanks are large (greater than 40,000 gallons), closed top, gasoline, ethanol, distillate, or interface 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 Tank No. 11 which was modified in 2006 and Tank No. 15, which was reconstructed in 1996. The modification and reconstruction of Tanks No. 11 and No. 15 subject these tanks to the federal New Source Performance Standards under 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.

Tanks No. 3 and 9 are subject to the area source HAP requirements of 40 CFR 63, Subpart BBBBBB for gasoline storage tanks at bulk gasoline terminals and satisfy the requirements of 40 CFR 63, Subpart BBBBB by complying with 40 CFR 60, Subpart Kb.

Tank No. 10 is currently permitted by the Department to store ethanol or gasoline, but currently stores ethanol. The Permittee did not identify Tank No. 10 as an affected gasoline storage tank subject to Subpart BBBBBB in the initial notification and subsequent Notification of Compliance Status and semiannual reports required by the subpart. The Permittee must certify and demonstrate compliance with Subpart BBBBBB for Tank No. 10 prior to returning the tank to gasoline service. As a current ethanol only tank, Tank No. 10 is subject to the requirements of COMAR 26.11.13.

Applicable Requirements

A. 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 or equivalent mechanical shoe 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.

(3) For EU-3, EU-9, EU-11, and EU-15, **40 CFR 60, Subpart Kb** which requires the Permittee to equip the storage vessel with a fixed roof or geodesic dome in combination with an internal floating roof meeting the following specifications:

(a) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof or geodesic dome. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

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

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

(ii) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.

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

(c) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

(d) Each opening in the internal floating roof 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.

(e) 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.

(f) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

(g) Each penetration of the internal floating roof 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.

(h) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof or geodesic dome shall have a flexible fabric sleeve seal or a gasketed sliding cover.

(i) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

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

B. Control of HAP

Gasoline storage tanks subject to and in compliance with the control requirements of 40 CFR 60, Subpart Kb 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

Tanks No. 11 and 15 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 and 40 CFR 60, Subpart Kb. 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 an internal inspection within 10 years from the date of the last internal inspection.

In the Notification of Compliance Status required under 40 CFR 63, Subpart BBBBBB, the Permittee identified Tank No. 3 and Tank No. 9 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 for Tank No. 3 and Tank No. 9 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 and 40 CFR 60, 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 periodic monitoring required for compliance.

C. Operational Limitation

The Permittee shall only store ethanol in Tank No. 10, ethanol or distillate oil in Tank No. 11, and gasoline interface in Tank No. 15 unless the Permittee certifies and demonstrates compliance with 40 CFR 63, Subpart BBBBBB for these tanks. **[Authority: ARA Permit to Construct No. 510-9-0093 issued on December 5, 2006, and COMAR 26.11.02.09A]**

Compliance Demonstration and Rationale for Periodic Monitoring Strategy for the Operational Limitation

The CITGO/Sunoco Petroleum Terminal elected to limit storage in Tank No. 11 to ethanol or distillate only in order to be exempt from the Department's expanded public participation process for the permit to construct issued on December 5, 2006. The Permittee also elected to limit storage to gasoline

interface only for Tank No. 15 in order to preclude applicability of 40 CFR 63 Subpart BBBBBB. Tank No. 10 is permitted to store gasoline, but only after the Permittee certifies and demonstrates compliance with 40 CFR 63, Subpart BBBBBB. The Permittee is already required to keep records of the materials stored in the aforementioned tanks to comply with the requirements of 40 CFR 60, Subpart Kb. These records are sufficient to demonstrate compliance with the storage limitation. No periodic monitoring is required.

EU-6: Tank No. 6 – 288,750-gallon (6,875-barrel) additive storage tank equipped with an internal floating roof with mechanical shoe seal.

EU-19: Tank No. 19 – 10,000-gallon additive horizontal storage tank equipped with fixed roof.

EU-23: Tank No. 23 – 10,500-gallon additive horizontal storage tank equipped with fixed roof.

Tank No. 6 was constructed in 1938 (and reconstructed in 1992), Tank No. 19 was constructed in 1992, and Tank No. 23 was constructed in 1993. All three tanks are used to store additive for gasoline. The tanks are sources of VOC emissions but are not subject to the VOC RACT requirements for VOC storage tanks in COMAR 26.11.13 because the vapor pressure of the additive does not meet the vapor pressure applicability threshold specified in COMAR 26.11.13. The tanks are subject to the general VOC requirements of COMAR 26.11.06.06.

Applicable Requirements

A. Control of VOC

(1) **COMAR 26.11.06.06B(1)(a)** which requires that the Permittee limit emissions of VOC to not more than 200 pounds per day from installations constructed before May 12, 1972, unless VOC emissions are reduced by 85 percent or more overall. This requirement applies to EU-6.

(2) **COMAR 26.11.06.06B(1)(b)** which requires that the Permittee limit emissions of VOC to not more than 20 pounds per day from installations constructed after May 12, 1972, unless VOC emissions are reduced by 85 percent or more overall. This requirement applies to EU-19 and EU-23.

B. Operational Limitation

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

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

VOC emissions from Tank No. 6, Tank No. 19 and Tank No. 23 over the last five years average less than 1 pound per day per tank. This is well below the 200 pounds per day VOC limit for Tank No. 6 and 20 pounds per day VOC limit for Tank Nos. 19 and 23.

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

EU-LR: Six-lane loading rack equipped with a 10 milligrams per liter John Zink Vapor Combustion Unit.

EU-LR is a six-lane truck loading rack controlled by a John Zink Vapor Combustion Unit. The loading rack was installed in 1996 to replace an existing loading rack. The loading rack is subject to the requirements of 40 CFR, Part 60, Subpart XX – Standards of Performance for Bulk Gasoline Terminals. Subpart XX applies to loading racks constructed or modified after December 17, 1980. The John Zink Vapor Combustion Unit was installed in 1990 for the existing loading rack and is now used for the current loading rack. The loading rack is also subject to VOC requirements in COMAR 26.11.13 for VOC loading operations and the area source HAP requirements of 40 CFR 63, Subpart BBBBBB for gasoline loading at bulk gasoline terminals.

A permit to construct was issued on April 10, 1996, for the installation of the current six-lane loading rack. In order to avoid a VOC emissions, increase of greater than 25 tons per year and major NSR applicability for the installation of the loading rack, the permit to construct limited VOC emissions from the John Zink Vapor Combustion Unit to 0.083 pounds of VOC per 1000 gallons of gasoline or VOC loaded (10 milligrams of VOC per liter of gasoline or VOC loaded). The permit to construct also limited gasoline throughput for the loading rack to 382 million gallons in any consecutive 12-month period. The Permittee is required to conduct performance tests on the John Zink Vapor Combustion Unit at least once every five years. The most recent test was conducted on August 12, 2021. The emissions result was 2.53 mg of VOC per liter of gasoline loaded

which is in compliance with the maximum acceptable limit of 10 mg of VOC per liter of gasoline.

In 2004, the Permittee requested an increase of the loading rack gasoline and ethanol throughput limitation of 382 million gallons in any consecutive 12-month period. A permit to construct was issued on September 2, 2004, to increase the loading rack gasoline and ethanol throughput limitation from 382 million gallons to 500 million gallons in any consecutive 12-month period. In order to avoid a VOC emission, increase of greater than 25 tons per year and major NSR applicability for the throughput increase, the permit to construct limits the Permittee to loading gasoline or VOC into vapor tight tank trucks that have been certified as capable of sustaining a pressure change of not more than 1 inch of water (equivalent to a fugitive emission rate of 9 milligrams per liter of gasoline or VOC loaded). This tank truck vapor tightness requirement is more restrictive than COMAR 26.11.13 and 40 CFR 60, Subpart XX. The Permittee is also still subject to the 0.083 pounds of VOC per 1000 gallons of gasoline or VOC loaded (10 milligrams of VOC per liter of gasoline or VOC loaded) emissions limitation for the John Zink Vapor Combustion Unit.

Applicable Requirements

A. Visible Emissions Limitation

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

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

Compliance Demonstration for VE Limitation

The VCU is the only equipment associated with the loading rack that is capable of causing visible emissions. The Permittee shall observe the stack of the VCU for visible emissions at least once per week when the VCU is operating. The observation shall be conducted as specified under Indicator No. 2 of the CAM Plan for the VCU. The Permittee shall maintain records of the observations and shall report any excursions to the Department as specified under Indicator No. 2 of the CAM Plan for the VCU.

Rationale for Periodic Monitoring Strategy for VE Limitation

Visible emissions from the VCU are unlikely and would only occur if the unit is malfunctioning. A weekly 1-minute visible emissions observation of the VCU stack when the VCU is operating is sufficient to demonstrate compliance with

the no visible emission requirement. In addition, preventive maintenance required by the CAM Plan for the unit will further ensure that the unit is operating properly at all times.

B. Control of VOC and HAP (Vapor Collection and Control Requirements)
COMAR 26.11.13.04A(1)(a), 40 CFR 60, Subpart XX, and 40 CFR 63, Subpart BBBBBB which require vapor collection and control as follows:

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

(2) The vapor collection and control system shall control at least 90 percent of all vapors and emissions may not exceed 10 milligrams of VOC per liter of gasoline or VOC loaded into gasoline cargo tanks at the loading rack.

[Authority: COMAR 26.11.13.04A(1)(a), 40 CFR §60.502(a) and (b), §63.11088(a), §63.11092(d), Table 2, Items 1(a) and 1(b) of 40 CFR 63, Subpart BBBBBB, and Premises Wide ARA Permit to Construct No. 24-9-0098 issued April 10, 1996.]

Compliance Demonstration for Vapor Collection and Control Requirements

The Permittee is required to maintain VOC emissions from the loading rack at less than 10 milligrams of VOC per liter of gasoline of VOC loaded which is less than the 35 milligrams per liter standard required by COMAR and the 80 milligrams per liter standard required by 40 CFR 63, Subpart BBBBBB.

To demonstrate compliance with the vapor collection and control requirements, the Permittee uses a VCU as the primary control device for the loading rack. The Permittee must monitor the VCU for the presence of a pilot flame and operate the VCU in accordance with a monitoring and inspection plan specified in 40 CFR 63, Subpart BBBBBB. The Permittee must also perform semiannual preventive maintenance on the VCU. In addition, a performance test on the VCU is required at least once every five years (but no more than 60 months after the previous performance test) during the period between May and September 15. The VCU was last tested in 2021. The test indicated that the VCU reduced VOC emissions to 2.53 milligrams per liter of gasoline loaded, demonstrating compliance with the 10 milligrams per liter emissions standard. The VOC destruction efficiency was determined to be 99.6%.

Rationale for Periodic Monitoring Strategy for Vapor Collection and Control Requirements

COMAR 26.11.13, 40 CFR 63, Subpart BBBBBB, and 40 CFR 60 Subpart XX outline very specific compliance methods for the capture and control of VOC from gasoline cargo tank loading racks. The VCU is monitored through a required periodic monitoring and inspection plan and CAM Plan. In addition, COMAR requires performance testing of the VCU every five years. No additional monitoring is required to demonstrate compliance.

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

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

(2) ARA Permit to Construct No. 510-9-0093 issued on September 2, 2004 which requires that loadings of gasoline or VOC into tank trucks be limited to vapor tight tank trucks that have been certified as capable of sustaining a pressure change of not more than 1 inch of water (equivalent to a fugitive emission rate of 9 milligrams per liter of gasoline or VOC loaded) in 5 minutes when pressurized to a gauge pressure of 18 inches of water, or evacuated to a gauge pressure of 6 inches of water, during a test. **[Note: This also satisfies the requirements of 40 CFR 60.502(e) and COMAR 26.11.13.05A.]**

Compliance Demonstration for Vapor Tight Cargo Tank Requirements

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

Rationale for Periodic Monitoring Strategy for Vapor Tight Cargo Tank Requirements

COMAR 26.11.13 40 CFR 60 Subpart XX, and 40 CFR 63, Subpart BBBBBB outline the specific methods and procedures for demonstrating compliance with the vapor tight cargo tank requirements. No additional periodic monitoring is necessary to demonstrate compliance.

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

COMAR 26.11.13.04A(1)(b), 40 CFR 60 Subpart XX, and 40 CFR 63, Subpart BBBBBB which require the Permittee design and operate the vapor collection and control system and the loading equipment so that during loading:

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

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

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

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

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

Compliance Demonstration for Back Pressure and Leak Requirements

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

Rationale for Periodic Monitoring Strategy for Back Pressure and Leak Requirements

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

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

COMAR 26.11.13.04A(1)(c), 40 CFR 60 Subpart XX, and 40 CFR 63, Subpart BBBBBB, which specify the following design and operational requirements:

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

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

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

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

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

Compliance Demonstration and Rationale for Periodic Monitoring Strategy for Design and Operational Requirements

The loading rack and vapor collection and control systems are designed to operate as required by COMAR 26.11.13.04A(1)(c), 40 CFR §60.502(f) and (g), and 40 CFR 63, Subpart BBBBBB. The loading rack is equipped with a bottom loading system. Periodic monitoring is not required to demonstrate compliance.

F. Operational Limitation

ARA Permit to Construct No. 510-9-0093 issued on September 2, 2004, which limits total gasoline and ethanol throughput loaded into tanks trucks to not greater than 500 million gallons in any consecutive 12-month period.

Compliance Demonstration and Rationale for Periodic Monitoring Strategy for the Operational Limitation

To demonstrate compliance with the throughput limitation, the Permittee shall keep monthly records to document that total gasoline and ethanol throughput for each consecutive twelve (12) months does not exceed 500 million gallons. The records shall be made available to the Department upon request. The Permittee shall report any incidences of excess emissions as required in permit condition 4 of the Title V – Part 70 Operating Permit, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations". Required records of gasoline throughput are sufficient to demonstrate compliance with the throughput limit. No periodic monitoring is required.

CAM Plan Requirements

The loading rack at the Terminal uses a John Zink Vapor Combustion Unit to meet federally enforceable emission limits (COMAR 26.11.13.04A(1)(a) and 40 CFR 60.502(a) and (b)). The VOC emissions from the loading rack, pre-control, would be greater than the major source threshold of 25 tons per year. The loading rack is not subject to major source MACT requirements and is not otherwise exempt from CAM. CAM requirements apply to the John Zink Vapor Combustion Unit.

Rationale for Selection of Performance Indicators in the CAM Plan

The following five (5) performance indicators in the CAM Plan for the John Zink Vapor Combustion Unit were selected to provide a reasonable level of assurance that emissions of VOC from the loading of gasoline or VOC at the truck loading rack would be controlled by at least 90% and would not exceed 10 milligrams of VOC per liter of gasoline or VOC loaded.

1. Indicator 1 – Photoelectric eye – Presence of flame
   The John Zink Vapor Combustion Unit system is equipped with a photoelectric eye to detect the presence of a pilot flame. This indicator was selected because the presence of the pilot flame is directly related to the combustion performance of the unit. If a pilot flame is not detected by the photoelectric eye, vapors from the loading rack cannot be introduced into the unit. Tank trucks cannot be loaded unless the unit is in operation. The lack of a pilot flame will automatically shut-down loading operations.

2. Indicator 2 – Visible emissions observations
   Visible emissions from the John Zink Vapor Combustion Unit would indicate incomplete combustion of the VOC vapors, or a malfunction of the unit. This indicator was selected so that the Permittee can determine if visible emissions are occurring.

3. Indicator 3 – Equipment leak checks
   The John Zink Vapor Combustion Unit is designed to be leak-tight during loading. If there are leaks, the unit may not collect all vapors and control at least 90% of all vapors from the loading rack. This indicator was selected so that the Permittee can determine if leaks are occurring during loading.

4. Indicator 4 – Vapor collection back pressure checks
   The John Zink Vapor Combustion Unit is designed to meet the applicable pressure requirements. If the back pressure in the vapor collection system exceeds 18 inches of water column, the pressure

relief valves in the tank trucks and in the vapor collection line may open and release VOC to the atmosphere. High back pressure will increase losses of vapor from any leaks that may be in the system. This indicator was selected so that the Permittee can determine if the back pressure exceeds 18 inches of water column.

5. Indicator 5 – Work Practice – Preventive maintenance
   Preventive maintenance, as recommended by the equipment vendor, should be performed on the John Zink Vapor Combustion Unit at least quarterly. This indicator was selected because preventive maintenance will ensure proper operation and performance of the John Zink Vapor Combustion Unit.

The following tables contain the CAM Plan for the John Zink Vapor Combustion Unit that is included in Table IV-CAM of the renewal Title V – Part 70 Operating Permit:

Table IV – CAM CAM Plan for the Vapor Combustion Unit (VCU)		
40 CFR, Part 64 Requirement	**Indicator 1**	**Indicator 2**
Indicator 64.4(a)(1)	Photoelectric eye – Presence of flame	Visible emissions observations during loading operation
Indicator Range(s) 64.4(a)(2)	An excursion is defined as a failure for the pilot detector to shutdown the VCU when there is no flame. All excursions shall be reported to MDE in semi-annual monitoring reports.	An excursion occurs if visible emissions observed. All excursions will be reported to the MDE in semi-annual monitoring reports. An excursion will trigger an investigation, corrective action, and a reporting requirement.
Performance Criteria 64.4(a)(3)		
A. Data Representativeness	The pilot detector controls the operation of the VCU. When no pilot flame is detected, the VCU cannot start-up and if no flame is detected during operation, the VCU automatically shuts down and loading ceases.	The observer looks for visible emissions just above the exhaust outlet of the combustor.
B. Verification of Operational Status	The pilot detector is connected to an interlock system that ensures the VCU cannot operate, and trucks cannot be loaded if no flame is detected.	N/A
C. QA/QC Practices and Criteria	VCU receives preventive maintenance quarterly. During each visit the following items are checked to ensure proper pilot operation: • Pull and clean pilot strainer • Pull and clean assist gas strainer • Check all indicator lights and sensors, replace if faulty • Inspect spark ignition systems	The observers are trained on procedures in making an observation and record keeping requirements.

	• Ensure burner scanner is operating properly, blocking scanner and starting unit. Unit must shutdown on flame failure • Complete start-up procedure checked	
D. Monitoring Frequency	Pilot detector operates continuously.	At least once per week, the Permittee shall observe the stack of the VCU for visible emissions. An operator familiar with the maintenance and operation of the VCU shall conduct each observation for a 1-minute period.
E. Data Collection Procedures	Results of inspection and preventive maintenance of the pilot operations are manually recorded and maintained onsite.	Results of observations will be manually recorded and maintained on site. Records will include date, time, and result of observation.
F. Averaging Procedures	N/A	N/A

Table IV – 4(continued) CAM Plan for the Vapor Combustion Unit			
Part 64 Requirement	**Indicator 3**	**Indicator 4**	**Indicator 5**
Indicator 64.4(a)(1)	Equipment leaks	Vapor collection line back pressure	Work Practice - Preventive maintenance
Indicator Range(s) 64.4(a)(2)	Once each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline or VOC will be inspected during the loading of tank trucks for total organic compounds liquid or vapor leaks. The detection method will be sight, sound, or smell. An excursion is defined as detection of a leak by sight, sound, or smell for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detecting the leak. All excursions and corrective actions taken will be reported to the MDE in semi-annual monitoring reports.	Once each calendar month, the vapor collection line back pressure will be checked during the loading of trucks. An excursion is defined as when the pressure gauge reading shows back pressure to be greater than 18 inches of water column. An excursion will trigger an investigation, corrective action, and a reporting requirement. All excursions will be reported to the MDE in semi-annual monitoring reports.	Proper operation is verified by performing preventive maintenance as recommended by VCU manufacturer quarterly. An excursion occurs if preventive maintenance is not performed or documented. All excursions will be reported in semi-annual monitoring reports.
Performance Criteria 64.4(a)(3)			
A. Data Representative ness	The terminal operations personnel will be trained on the procedures to detect, record, and initiate corrective actions.	A pressure gauge that is attached to a spool piece that is inserted between the vapor line connection of the tanker and the terminal's vapor collection line is used to measure back pressure. The gauge measures pressure within ± 0.2 inch of water column.	Proper operation is verified by trained personnel or a service person using a preventive maintenance checklist that is based on recommendations provided by the VCU manufacturer.
B. Verification of Operational Status	N/A	Monthly check on loading bay with manual log entry.	N/A
C. QA/QC Practices and Criteria	The operations' personnel responsible for performing the monthly inspections will be trained on the procedures to follow. The terminal will maintain a record of employees trained to perform the inspections.	Preventive maintenance is performed on pressure gauge quarterly and is calibrated or replaced at least once per year.	Service persons are trained on inspection and maintenance procedures.
D. Monitoring Frequency	Monthly	Monthly	Quarterly
E. Data Collection	Manual records of results of inspections,	Monthly readings with	Results of inspection and

Procedures	leaks found, and leaks repaired.	manual entry.	maintenance performed during preventive maintenance are manually recorded and maintained on site.
F. Averaging Procedures	N/A	N/A	N/A

Facility Wide Requirements

In previous Title V – Part 70 Operating Permits, the CITGO/Sunoco Petroleum Terminal was identified as a synthetic minor source with respect to HAP emissions. With the phase out of MTBE (methyl tertiary-butyl ether) from gasoline and the existing, federally enforceable, limitations on VOC from the facility for NSR purposes, the CITGO/Sunoco Petroleum Terminal does not have the potential to emit major source levels of HAP. Therefore, the CITGO/Sunoco Petroleum Terminal is a true minor source of HAP emissions. Premises wide HAP limits or monthly HAP emissions records are no longer required for this facility and not included in the renewal permit.

As an area source of HAP, the CITGO/Sunoco Petroleum Terminal is 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.

Control of HAP

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

Compliance Demonstration for Control of HAP

The Permittee must operate and maintain the facility in a manner that minimizes emissions and conduct monthly leak inspections of all equipment in gasoline service. The Permittee must keep records demonstrating that the facility is operated and maintained properly and leak inspection logs to document the results of each monthly leak inspection. The Permittee must also include these records in a semiannual report as specified in 40 CFR 63, Subpart BBBBBB.

Rationale for Periodic Monitoring Strategy for Control of HAP

40 CFR 63, Subpart BBBBBB outlines the specific procedures, and record keeping and reporting requirements that demonstrate continuous compliance with the subpart. No additional periodic monitoring is required.

COMPLIANCE SCHEDULE

CITGO/Sunoco Petroleum Terminal is currently in compliance with all applicable air quality regulations.

TITLE IV – ACID RAIN

Not Applicable.

TITLE VI – OZONE DEPLETING SUBSTANCES

CITGO/Sunoco Petroleum Terminal is not subject to Title VI requirements.

SECTION 112(r) – ACCIDENTAL RELEASE

CITGO/Sunoco Petroleum Terminal is not subject to the requirements of Section 112(r).

PERMIT SHIELD

CITGO/Sunoco Petroleum Terminal 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. 6 Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;

The containers are subject to COMAR 26.11.19.09D, which requires that the Permittee control emissions of volatile organic compounds (VOC) from cold degreasing operations by meeting the following requirements:

(a) COMAR 26.11.19.09D(2)(b), which establishes that the Permittee shall not use any VOC degreasing material that exceeds a vapor pressure of 1 mm Hg at 20 ° C;

(b) COMAR 26.11.19.09D(3)(a—d), which requires that the Permittee implement good operating practices designed to minimize spills and evaporation of VOC degreasing material. These practices, which shall be established in writing and displayed such that they are clearly visible to operators, shall include covers (including water covers), lids, or other methods of minimizing evaporative losses, and reducing the time and frequency during which parts are cleaned;

(c) COMAR 26.11.19.09D(4), which prohibits the use of any halogenated VOC for cold degreasing.

The Permittee shall maintain on site for at least five (5) years, and shall make available to the Department upon request, the following records of operating data:

(a) Monthly records of the total VOC degreasing materials used; and

(b) Written descriptions of good operating practices designed to minimize spills and evaporation of VOC degreasing materials.

(2) ✓ Brazing, soldering, or welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals and not directly related to plant maintenance, upkeep and repair or maintenance shop activities;

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

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

The Permittee maintains the following propane storage tanks:

- Tank No. 31 - One (1) 1000-gallon propane storage tank.

- Tank No. 34 – One (1) 100-gallon propane storage tank.

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

The Permittee maintains the following distillate storage tanks:

- Tank No. 4 – One (1) 1,782,312-gallon (42,436-barrel) distillate storage tank.
- Tank No. 8 – One (1) 4,655,196-gallon (110,838-barrel) distillate storage tank.
- Tank No. 12 – One (1) 4,927,860-gallon (117,330-barrel) distillate storage tank.
- Tank No. 13 – One (1) 1,755,390-gallon (41,795-barrel) distillate storage tank.

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

No. 1 Tank No. 20 – One (1) 550-gallon additive storage tank.

No. 1 Tank No. 21 – One (1) 1,000-gallon additive storage tank.

No. 1 Tank No. 22 – One (1) 2,000-gallon additive storage tank.

No. 1 Tank No. 27 – One (1) 2,000-gallon additive storage tank.

STATE ONLY ENFORCEABLE REQUIREMENTS

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

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

1. Applicable Regulations:

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

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

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

2. Record Keeping and Reporting:

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

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

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

DRAFT

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1800 Washington Boulevard, Suite 720
Baltimore, MD 21230

☐ Construction Permit ☒ Part 70 Operating Permit

PERMIT NO.:
24-510-0119

DATE ISSUED:
_____

PERMIT FEE:
To Be Paid in Accordance with COMAR 26.11.02.19B

EXPIRATION DATE:
August 31, 2028

LEGAL OWNER & ADDRESS
Citgo/Sunoco Baltimore Terminal
2201 Southport Ave
Curtis Bay, Maryland 21226
Attn: Roger Bullock, Terminal Manager

SITE
Citgo/Sunoco Baltimore Terminal
2201 Southport Ave
Curtis Bay, MD 21226
AI # 3003

SOURCE DESCRIPTION

Bulk Petroleum Marketing Terminal.

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

Program Manager

Director, Air and Radiation Administration

CITGO/SUNOCO PETROLEUM TERMINAL
2201 SOUTHPORT AVENUE
BALTIMORE, MARYLAND
DRAFT PART 70 OPERATING PERMIT NO. 510-0119

CITGO/SUNOCO PETROLEUM TERMINAL
2201 SOUTHPORT AVENUE
BALTIMORE, MARYLAND
DRAFT PART 70 OPERATING PERMIT NO. 510-0119

SECTION I SOURCE IDENTIFICATION

1. DESCRIPTION OF FACILITY

CITGO/SUNOCO Terminal owns and operates a bulk petroleum marketing terminal located at 2201 Southport Avenue in Baltimore, Maryland. The terminal is in Baltimore City, Maryland Air Quality Region III. The primary SIC code for this facility is 5171.

2. FACILITY INVENTORY LIST

Emissions Unit Number	MDE Registration Number	Emissions Unit Name and Description	Date of Installation
EU-1	510-0119-9-0093	Tank No. 1 - 3,854,382-gallon (91,771-barrel) gasoline, ethanol, and distillate storage tank equipped with an internal floating roof with mechanical shoe seal.	1954
EU-2		Tank No. 2 – 2,646,756-gallon (63,018-barrel) gasoline, ethanol, and distillate storage tank equipped with an internal floating roof with mechanical shoe seal.	1971
EU-3		Tank No. 3 – 982,380-gallon (23,390-barrel) gasoline, ethanol, and distillate storage tank equipped with an internal floating roof with mechanical shoe seal.	1955
EU-5		Tank No. 5 – 1,683,360-gallon (40,080-barrel) gasoline, ethanol, and distillate storage tank equipped with an internal floating roof with mechanical shoe seal.	1960
EU-6		Tank No. 6 – 288,750-gallon (6,875-barrel) additive storage tank equipped with an internal floating roof with mechanical shoe seal.	1938, reconstructed in 1992
EU-9		Tank No. 9 – 2,516,850-gallon (59,925-barrel) gasoline, ethanol, and distillate storage tank equipped with an internal floating roof with mechanical shoe seal.	1960
EU-10		Tank No. 10 – 3,441,606-gallon (81,943-barrel) gasoline and ethanol storage tank equipped with an internal floating roof with mechanical shoe seal.	1958

Emissions Unit Number	MDE Registration Number	Emissions Unit Name and Description	Date of Installation
EU-11		Tank No. 11 – 7,363,188-gallon (175,314-barrel) ethanol and distillate storage tank equipped with an internal floating roof with mechanical shoe seal.	1959, modified in 2006 for ethanol storage
EU-15		Tank No. 15 – 98,280-gallon (2,340-barrel) gasoline and interface storage tank equipped with an internal floating roof with double wiper seal.	Reconstructed in 1996
EU-19		Tank No. 19 – 10,000-gallon additive horizontal storage tank equipped with fixed roof.	1992
EU-23		Tank No. 23 – 10,500-gallon additive horizontal storage tank equipped with fixed roof.	1993
EU-LR		Six-lane loading rack equipped with a 10 milligrams per liter John Zink Vapor Combustion Unit.	Reconstructed in 1996

SECTION II GENERAL CONDITIONS

1. DEFINITIONS

[COMAR 26.11.01.01] and [COMAR 26.11.02.01]

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

2. ACRONYMS

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

SIC	Standard Industrial Classification
SO_2	Sulfur Dioxide
TAP	Toxic Air Pollutant
tpy	tons per year
VE	Visible Emissions
VOC	Volatile Organic Compounds

3. EFFECTIVE DATE

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

4. PERMIT EXPIRATION

[COMAR 26.11.03.13B(2)]

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

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

5. PERMIT RENEWAL

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

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

The Permittee, upon becoming aware that any relevant facts were omitted, or incorrect information was submitted in the permit application, shall submit such supplementary facts or corrected information no later than 10 days after becoming aware that this occurred. The Permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after the date a

completed application was submitted, but prior to the release of a draft permit. This information shall be submitted to the Department no later than 20 days after a new requirement has been adopted.

6. CONFIDENTIAL INFORMATION

[COMAR 26.11.02.02G]

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

7. PERMIT ACTIONS

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

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

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

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

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

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

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

8. PERMIT AVAILABILITY

[COMAR 26.11.02.13G]

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

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

[COMAR 26.11.03.20B]

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

10. TRANSFER OF PERMIT

[COMAR 26.11.02.02E]

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

11. REVISION OF PART 70 PERMITS – GENERAL CONDITIONS

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

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

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

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

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

12. SIGNIFICANT PART 70 OPERATING PERMIT MODIFICATIONS

[COMAR 26.11.03.17]

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

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

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

c. Significant permit modifications are subject to all requirements of COMAR 26.11.03 as they apply to permit issuance and renewal,

including the requirements for applications, public participation, and review by affected states and EPA, except:

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

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

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

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

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

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

13. MINOR PERMIT MODIFICATIONS

[COMAR 26.11.03.16]

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

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

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

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

(a) Adding new requirements,

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

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

(3) Does not require or modify a:

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

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

(c) Visibility or increment analysis;

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

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

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

(5) Is not a Title I modification; and

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

b. Application for a Minor Permit Modification

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

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

(2) The proposed minor permit modification;

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

(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.

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

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

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

14. ADMINISTRATIVE PART 70 OPERATING PERMIT AMENDMENTS

[COMAR 26.11.03.15]

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

a. An application for an administrative permit amendment shall:

(1) Be in writing;

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

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

b. An administrative permit amendment:

(1) Is a correction of a typographical error;

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

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

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

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

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

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

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

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

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

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

15. OFF-PERMIT CHANGES TO THIS SOURCE

[COMAR 26.11.03.19]

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

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

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

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

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

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

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

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

d. The Permittee shall keep a record describing:

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

(2) The emissions resulting from those changes.

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

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

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

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

16. ON-PERMIT CHANGES TO SOURCES

[COMAR 26.11.03.18]

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

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

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

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

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

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

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

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

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

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

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

(1) A description of the proposed change;

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

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

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

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

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

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

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

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

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

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

17. FEE PAYMENT

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

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

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

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

18. REQUIREMENTS FOR PERMITS-TO-CONSTRUCT AND APPROVALS

[COMAR 26.11.02.09.]

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

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

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

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

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

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

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

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

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

19. CONSOLIDATION OF PROCEDURES FOR PUBLIC PARTICIPATION

[COMAR 26.11.02.11C] and [COMAR 26.11.03.01K]

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

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

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

20. PROPERTY RIGHTS

[COMAR 26.11.03.06E(4)]

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

21. SEVERABILITY

[COMAR 26.11.03.06A(5)]

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

22. INSPECTION AND ENTRY

[COMAR 26.11.03.06G(3)]

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

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

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

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

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

23. DUTY TO PROVIDE INFORMATION

[COMAR 26.11.03.06E(5)]

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

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

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

24. COMPLIANCE REQUIREMENTS

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

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

a. Enforcement action,

b. Permit revocation or revision,

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

d. Any combination of these actions.

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

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

25. CREDIBLE EVIDENCE

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

26. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE

[COMAR 26.11.03.06E(2)]

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

27. CIRCUMVENTION

[COMAR 26.11.01.06]

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

28. PERMIT SHIELD

[COMAR 26.11.03.23]

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

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

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

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

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

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

29. ALTERNATE OPERATING SCENARIOS

[COMAR 26.11.03.06A(9)]

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

SECTION III PLANT WIDE CONDITIONS

1. PARTICULATE MATTER FROM CONSTRUCTION AND DEMOLITION

[COMAR 26.11.06.03D]

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

2. OPEN BURNING

[COMAR 26.11.07]

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

3. AIR POLLUTION EPISODE

[COMAR 26.11.05.04]

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

4. REPORT OF EXCESS EMISSIONS AND DEVIATIONS

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

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

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

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

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

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

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

5. ACCIDENTAL RELEASE PROVISIONS

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

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

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

6. GENERAL TESTING REQUIREMENTS

[COMAR 26.11.01.04]

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

7. EMISSIONS TEST METHODS

[COMAR 26.11.01.04]

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

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

a. 40 CFR 60, appendix A

b. 40 CFR 51, appendix M

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

8. EMISSIONS CERTIFICATION REPORT

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

9. COMPLIANCE CERTIFICATION REPORT

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

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

a. The compliance certification shall include:

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

(2) The compliance status;

(3) Whether the compliance was continuous or intermittent;

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

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

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

10. CERTIFICATION BY RESPONSIBLE OFFICIAL

[COMAR 26.11.02.02F]

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

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

11. SAMPLING AND EMISSIONS TESTING RECORD KEEPING

[COMAR 26.11.03.06C(5)]

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

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

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

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

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

e. The analytical techniques and methods used; and

f. The results of each analysis.

12. GENERAL RECORDKEEPING

[COMAR 26.11.03.06C(6)]

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

These records and support information shall include:

a. All calibration and maintenance records;

b. All original data collected from continuous monitoring instrumentation;

c. Records which support the annual emissions certification; and

d. Copies of all reports required by this permit.

13. GENERAL CONFORMITY

[COMAR 26.11.26.09]

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

14. ASBESTOS PROVISIONS

[40 CFR 61, Subpart M]

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

15. OZONE DEPLETING REGULATIONS

[40 CFR 82, Subpart F]

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

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

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

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

d. Persons performing maintenance, service, repairs or disposal of appliances shall certify with the Administrator pursuant to 40 CFR 82.162.

e. Persons disposing of small appliances, MVACS, and MVAC-like appliances as defined in 40 CFR 82.152, shall comply with record keeping requirements pursuant to 40 CFR 82.166.

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

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

16. ACID RAIN PERMIT

Not applicable

SECTION IV PLANT SPECIFIC CONDITIONS

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

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

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

Table IV – 1	
1.0	**Emissions Unit Number(s)** EU-1: Tank No. 1 – 3,854,382-gallon (91,771-barrel) gasoline, ethanol, and distillate storage tank equipped with an internal floating roof with mechanical shoe seal. EU-2: Tank No. 2 – 2,646,756-gallon (63,018-barrel) gasoline, ethanol, and distillate storage tank equipped with an internal floating roof with mechanical shoe seal. EU-5: Tank No. 5 – 1,683,360-gallon (40,080-barrel) gasoline, ethanol, and distillate storage tank equipped with an internal floating roof with mechanical shoe seal. (MDE ARA Registration No. 510-0119-9-0093)
1.1	**Applicable Standards/Limits:** Control of VOC and HAP (1) **COMAR 26.11.13.03A(1) (a) and (b)** which requires the Permittee to meet the following equipment requirements:

Table IV – 1

(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 or equivalent mechanical shoe 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.

(3) **40 CFR 63, Subpart BBBBBB** which requires the Permittee to meet emission limits and management practices for gasoline storage tanks at bulk gasoline terminals.

Table IV – 1	
	(a) The Permittee has elected to comply with 40 CFR 63, Subpart BBBBBB by equipping each tank with an internal floating roof meeting the following specifications: (i) The internal floating roof shall be equipped with a liquid-mounted seal or a mechanical shoe seal. (ii) The floating roof shall float on the stored liquid surface at all times, except when the floating roof is supported by its leg supports or other support devices (e.g., hangers from the fixed roof). (iii) When the storage vessel is storing liquid, but the liquid depth is insufficient to float the floating roof, the process of filling to the point of refloating the floating roof shall be continuous and shall be performed as soon as practical. (iv) Each cover over an opening in the floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall be closed at all times, except when the cover must be open for access. (v) Each automatic bleeder vent (vacuum breaker vent) and rim space vent shall be closed at all times, except when required to be open to relieve excess pressure or vacuum, in accordance with the manufacturer's design. (vi) Each unslotted guide pole cap shall be closed at all times except when gauging the liquid level or taking liquid samples. **[Authority: 40 CFR §63.1063(a)(1)(i)(A) and (B), §63.1063(b), §63.11087(a) and (b) and Table 1, Option 2(d) of 40 CFR 63, Subpart BBBBBB]**
1.2	**<u>Testing Requirements</u>:** <u>Control of VOC and HAP</u> (1) See Monitoring, Record Keeping and Reporting Requirements.

Table IV – 1	
	(2) and (3) The Permittee shall determine the total seal gap by summing the areas of the individual gaps. The lengths and widths of the gaps are measured by passing a 1/8-inch diameter probe between the seal and the tank wall and other obstructions in the tank. (The probe should move freely without forcing or binding against the seal.) **[Authority: COMAR 26.11.13.03A(4)]**
1.3	**Monitoring Requirements:** Control of VOC and HAP (1) The Permittee shall perform an annual visual inspection of each tank's gauging and sampling devices. If a visual inspection shows noncompliance with the gas tight requirement, the Permittee shall repair the device within 45 days or empty and remove the tank from service within 45 days. If a repair cannot be made within 45 days and if the tank cannot be emptied within 45 days, a 30-day extension may be requested from the Department. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the Permittee will take that assure that the device will be repaired, or the tank will be emptied as soon as possible. **[Authority: COMAR 26.11.02.02H and COMAR 26.11.13.03A(1)(a)]** (2) and (3) The Permittee shall comply with the following inspection requirements: (a) At least once per year, the Permittee shall visually inspect the floating roof deck, deck fittings, and rim seal through openings in the fixed roof as per 40 CFR §63.1063(d)(2). Any of the following conditions: stored liquid on the floating roof, holes, or tears in the primary or secondary seal, floating roof deck, deck fittings, or rim seals that are not functioning as designed, or failure to comply with the operational requirements of 40 CFR §63.1063(b) constitutes inspection failure. Identification of holes or tears in the rim seal is required only for the seal that is visible from the top of the storage vessel.

Table IV – 1	
	(b) The Permittee shall visually inspect the floating roof deck, deck fittings, and rim seals as per 40 CFR §63.1063(d)(1). The floating roof inspection shall be conducted by visually inspecting the floating roof deck, deck fittings and rim seals from within the storage vessel each time the storage vessel is completely emptied and degassed or within 10 years from the last internal inspection, whichever occurs first. Any of the following conditions: stored liquid on the floating roof, holes or tears in the primary or secondary seal, floating roof deck, deck fittings, or rim seals that are not functioning as designed, or failure to comply with the operational requirements of 40 CFR §63.1063(b) constitutes inspection failure. (c) Conditions causing inspection failures shall be repaired as follows: (i) If the inspection is performed while the storage vessel is not storing liquid, repairs shall be completed before the refilling of the storage vessel with liquid. (ii) If the inspection is performed while the storage vessel is storing liquid, repairs shall be completed or the vessel removed from service within 45 days. If a repair cannot be completed and the vessel cannot be emptied within 45 days, the Permittee may use up to 2 extensions of up to 30 additional days each. Documentation of a decision to use an extension shall include a description of the failure, shall document that alternate storage capacity is unavailable, and shall specify a schedule of actions that will ensure that the control equipment will be repaired, or the vessel will be completely emptied as soon as practical. **[Authority: COMAR 26.11.13.03A(3)(a), (b), and (c), 40 CFR §63.1063(c)(i), (d), and (e), §63.11087(c), and §63.11092(e)(1)]**

Table IV – 1	
1.4	**Record Keeping Requirements:** Control of VOC and HAP (1) The Permittee shall record the results of all visual inspections of each tank's gauging and sampling devices. The Permittee shall also record all repairs or replacements including the date and the action taken. **[Authority: COMAR 26.11.03.06C]** (2) and (3) The Permittee shall keep the following records: (a) The Permittee shall keep records of the dimensions of the storage vessel, an analysis of the capacity of the storage vessel, and an identification of the liquid stored for as long as liquid is stored in the storage vessel. (b) The Permittee shall keep the following records in hard copy or computer-readable form for at least five years in such a manner that they can be readily accessed within 24 hours: (i) If the floating roof passes inspection, a record shall be kept that includes the identification of the storage vessel that was inspected and the date of the inspection. (ii) If the floating roof fails inspection, a record shall be kept that includes the identification of the storage vessel that was inspected, the date of the inspection, a description of all inspection failures, a description of all repairs and the dates they were made, and the date the storage vessel was removed from service, if applicable. (iii) A record of the date when a floating roof is set on its legs or other support devices. The Permittee shall also keep a record of the date when the roof was refloated, and the record shall indicate whether the process of refloating was continuous. (iv) Documentation required by 40 CFR 63.1063(e)(2) if the Permittee elects to use an extension in accordance with 40 CFR §63.1063(e)(2).

Table IV – 1	
	(c) The Permittee shall record the average monthly storage temperature and throughput for each storage tank. **[Authority: COMAR 26.11.13.03C(1), (2), and (3), 40 CFR §63.1065(a), (b)(1), (c), and (d), §63.11087(e), and §63.11094(a)]**
1.5	**Reporting Requirements:** Control of VOC and HAP (1) Records of gauging and sampling device inspections shall be made available to the Department upon request. **[Authority: COMAR 26.11.03.06C]** (2) and (3) (a) To provide the Department the opportunity to have an observer present, the Permittee shall notify the Department at least 30 days before an internal inspection as required by 40 CFR §63.1063(d)(1). If an inspection is unplanned and the Permittee could not have known about the inspection 30 days in advance, then the Permittee shall notify the Department at least 7 days before the inspection. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, the notification including the written documentation may be made in writing and sent so that it is received by the Department at least 7 days before the inspection. (b) 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: (i) A copy of the inspection record required in 40 CFR §63.1065 when inspection failures occur. (ii) Documentation required by 40 CFR 63.1063(e)(2) if the Permittee elects to use an extension in accordance with 40 CFR §63.1063(e)(2). **[Authority: COMAR 26.11.13.03A(3)(d), 40 CFR §63.1066(b)(1), (2), and (4), §63.11087(e), and §63.11095(a)(1) and (4)]**

Table IV – 2	
2.0	**Emissions Unit Number(s):** EU-3: Tank No. 3 – 982,380-gallon (23,390-barrel) gasoline, ethanol, and distillate storage tank equipped with an internal floating roof with mechanical shoe seal. EU-9: Tank No. 9 – 2,516,850-gallon (59,925-barrel) gasoline, ethanol, and distillate storage tank equipped with an internal floating roof with mechanical shoe seal. EU-10: Tank No. 10 – 3,441,606-gallon (81,943-barrel) gasoline and ethanol storage tank equipped with an internal floating roof with mechanical shoe seal. EU-11: Tank No. 11 – 7,363,188-gallon (175,314-barrel) ethanol and distillate storage tank equipped with an internal floating roof with mechanical shoe seal. EU-15: Tank No. 15 – 98,280-gallon (2,340-barrel) gasoline and interface storage tank equipped with an internal floating roof with double wiper seal. Tanks No. 3 and No. 9 meet the requirements of NESHAP 40 CFR 63, Subpart BBBBBB by complying with NSPS 40 CFR 60, Subpart Kb (MDE ARA Registration No. 510-0119-9-0093)
2.1	**Applicable Standards/Limits:** A. 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 or equivalent

Table IV – 2

mechanical shoe 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.

(3) For EU-3, EU-9, EU-11 and EU-15 only, **40 CFR 60, Subpart Kb** which requires the Permittee to equip the storage vessel with a fixed roof or geodesic dome in combination with an internal floating roof meeting the following specifications:

(a) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof or geodesic dome. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

Table IV – 2

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

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

(ii) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.

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

(c) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

(d) Each opening in the internal floating roof 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.

Table IV – 2

(e) 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.

(f) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

(g) Each penetration of the internal floating roof 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.

(h) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof or geodesic dome shall have a flexible fabric sleeve seal or a gasketed sliding cover.

(i) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

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

B. Control of HAP

Tanks Nos. 3 and 9 are 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)]**

C. Operational Limitation

The Permittee shall only store ethanol in Tank No. 10, ethanol or distillate oil in Tank No. 11, and gasoline interface in Tank No. 15 unless the Permittee certifies and demonstrates compliance with 40 CFR 63, Subpart BBBBBB for these tanks. **[Authority: ARA Permit to Construct No. 510-9-0093 issued on December 5, 2006, and COMAR 26.11.02.09A]**

Table IV – 2	
2.2	**Testing Requirements:** A. Control of VOC (1) See Monitoring, Record Keeping and Reporting Requirements. (2) and (3) The Permittee shall determine the total seal gap by summing the areas of the individual gaps. The lengths and widths of the gaps are measured by passing a 1/8-inch diameter probe between the seal and the tank wall and other obstructions in the tank. (The probe should move freely without forcing or binding against the seal.) **[Authority: COMAR 26.11.13.03A(4)]** B. Control of HAP See Monitoring, Record Keeping and Reporting Requirements. C. Operational Limitation See Record Keeping and Reporting Requirements.
2.3	**Monitoring Requirements:** A. Control of VOC (1) The Permittee shall perform an annual visual inspection of each tank's gauging and sampling devices. If a visual inspection shows noncompliance with the gas tight requirement, the Permittee shall repair the device within 45 days or empty and remove the tank from service within 45 days. If a repair cannot be made within 45 days and if the tank cannot be emptied within 45 days, a 30-day extension may be requested from the Department. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the Permittee will take that assure that the device will be repaired, or the tank will be emptied as soon as possible. **[Authority: COMAR 26.11.02.02H and COMAR 26.11.13.03A(1)(a)]** (2) and (3) The Permittee shall comply with the following inspection requirements for each tank:

Table IV – 2	
	(a) The Permittee shall visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling or refilling the storage vessel with volatile organic liquid. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the Permittee shall repair the items before filling or refilling the storage vessel. **[Authority: 40 CFR §60.113b(a)(1)]** (b) The Permittee shall visually inspect the internal floating roof and the primary seal and the secondary seal through manholes and roof hatches on the fixed roof or geodesic dome at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the volatile organic liquid 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 with 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 26.11.13.03A(3)(a) and (b), and 40 CFR §60.113b(a)(2) and (a)(3)(ii)]** (c) 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 surfaces from

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	the atmosphere, or the slotted membrane has more than 10 percent open area, the Permittee shall repair the items as necessary so that none of the conditions exist before refilling the storage vessel with volatile organic liquid. The storage vessel shall be inspected within 10 years from the date of the last internal inspection. **[Authority: COMAR 26.11.13.03A(3)(c) and 40 CFR §60.113b(a)(4)]** Note: Compliance with the internal inspection requirements of 40 CFR, Part 60, Subpart Kb §60.113b(a)(3)(i) and (a)(4) satisfy the internal inspection requirements of COMAR 26.11.13.03A(3)(c). Based on the revisions to 40 CFR, Part 60, Subpart Kb dated January 19, 2021, the Permittee has the option to meet the inspection requirements by complying with 40 CFR 63 Subpart WW, which allows 10-year internal seal inspection to be conducted while the tanks remain in service. If the Permittee chooses to comply with 40 CFR 63 Subpart WW, the Permittee must also comply with all conditions specified under 40 CFR 60.110b(e)(5), including the recordkeeping and reporting requirements listed under 40 CFR 60.110b(e)(5)(iv). B. Control of HAP See Monitoring Requirements for Table IV-2, 2.3A(2) and (3) above. C. Operational Limitation See Record Keeping and Reporting Requirements.
2.4	**Record Keeping Requirements:** A. Control of VOC (1) The Permittee shall record the results of all visual inspections of each tank's gauging and sampling devices. The Permittee shall also record all repairs or replacements including the date and the action taken. **[Authority: COMAR 26.11.03.06C]** (2) and (3) (a) The Permittee shall keep a record of each inspection performed as required by 40 CFR §60.113b(a)(1), (a)(2), (a)(3), and (a)(4) and COMAR 26.11.13.03A(3) for each storage tank. Each record shall identify the storage vessel on which the inspection was performed and shall

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contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). **[Authority: COMAR 26.11.13.03C(1) and 40 CFR §60.115b(a)(2)]**

(b) The Permittee shall record all repairs or replacement of the seals, or internal floating roof including a detailed description of work performed and the date and the action taken for each storage tank. **[Authority: COMAR 26.11.13.03C(2)]**

(c) The Permittee shall record the average monthly storage temperature and throughput for each storage tank. **[Authority: COMAR 26.11.13.03C(3)]**

(d) For EU-3, EU-9, EU-11, and EU-15 only, the Permittee shall maintain readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel. The records shall be maintained on-site for the life of the storage vessels. **[Authority: 40 CFR §60.116b(a) and (b)]**

(e) The Permittee shall maintain records of the volatile organic liquid stored, the period of storage, and the maximum true vapor pressure of the volatile organic liquid during the respective storage period for each storage tank. The maximum true vapor pressure shall be determined using the procedures listed in 40 CFR §60.116b(e). **[Authority: 40 CFR §60.116b(c) and (e) and COMAR 26.11.03.06C]**

B. Control of HAP
See Record Keeping Requirements in Table IV-2, 2.4A(2) and (3) above.

C. Operational Limitation
See Record Keeping Requirements in Table IV-2, 2.4A(2) and (3) above.

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2.5	**<u>Reporting Requirements</u>:** A. <u>Control of VOC</u> (1) Records of gauging and sampling device inspections shall be made available to the Department upon request. **[Authority: COMAR 26.11.03.06C]** (2) and (3) (a) The Permittee shall notify the Department in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by 40 CFR §60.113b(a)(1) and (a)(4) to afford the Department the opportunity to have an observer present. If the inspection required by 40 CFR §60.113b(a)(4) is not planned and the Permittee could not have known about the inspection 30 days in advance of refilling the tank, the Permittee shall notify the Department at least 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 seven (7) days prior to the refilling. **[Authority: 40 CFR §60.113b(a)(5) and COMAR 26.11.13.03A(3)(d)]** (b) If any of the conditions described in 40 CFR §60.113b(a)(2) are detected during the annual visual inspection required by 40 CFR §60.113b(a)(2), the Permittee shall furnish a report to the Department within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied, or the nature of and date the repair was made. **[Authority: 40 CFR §60.115b(a)(3)]** (c) 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),

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	the Permittee shall furnish a report to the Department within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR §60.112b(a)(1) or §60.113b(a)(3) and list each repair made. **[Authority: 40 CFR §60.115b(a)(4)]** B. Control of HAP See Reporting Requirements for Table IV-2, 2.5A(2) and (3) above. C. Operational Limitation Records of material storage shall be made available to the Department upon request. **[Authority: COMAR 26.11.03.06C]**

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3.0	**Emissions Unit Number(s):** EU-6: Tank No. 6 – 288,750-gallon (6,875-barrel) additive storage tank equipped with an internal floating roof with mechanical shoe seal. EU-19: Tank No. 19 – 10,000-gallon additive horizontal storage tank equipped with fixed roof. EU-23: Tank No. 23 – 10,500-gallon additive horizontal storage tank equipped with fixed roof. (MDE ARA Registration No. 510-0119-9-0093)
3.1	**Applicable Standards/Limits:** A. Control of VOC (1) **COMAR 26.11.06.06B(1)(a)** which requires that the Permittee limit emissions of VOC to not more than 200 pounds per day from installations constructed before May 12, 1972 unless VOC emissions are reduced by 85 percent or more overall. This requirement applies to EU-6. (2) **COMAR 26.11.06.06B(1)(b)** which requires that the Permittee limit emissions of VOC to not more than 20 pounds per day from

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	installations constructed after May 12, 1972 unless VOC emissions are reduced by 85 percent or more overall. This requirement applies to EU-19 and EU-23. B. Operational Limitation The Permittee shall store only additive or other volatile organic liquids that do not subject any of the storage tanks to the requirements of COMAR 26.11.13 and/or 40 CFR 60, Subpart Kb unless the Permittee obtains approval from the Department. **[Authority: COMAR 26.11.02.09A]**
3.2	**Testing Requirements:** A. Control of VOC See Record Keeping and Reporting Requirements. B. Operational Limitation See Record Keeping and Reporting Requirements.
3.3	**Monitoring Requirements:** A. Control of VOC See Record Keeping and Reporting Requirements. B. Operational Limitation See Record Keeping and Reporting Requirements.
3.4	**Record Keeping Requirements:** A. Control of VOC The Permittee shall keep records and make them available to the Department upon request of the amounts, types, and composition of all materials loaded into each tank. B. Operational Limitation The Permittee shall keep records and make them available to the Department upon request of the amounts, types, and composition of all materials loaded into each tank.

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3.5	**Reporting Requirements:** A. Control of VOC The Permittee shall report incidences of excess emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations". **[Authority: COMAR 26.11.03.06C]** B. Operational Limitation The Permittee shall report incidences of excess emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations". **[Authority: COMAR 26.11.03.06C]**

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4.0	**Emissions Unit Number(s):** EU-LR: Six-lane loading rack equipped with a 10 milligrams per liter John Zink Vapor Combustion Unit. (MDE ARA Registration No. 510-0119-9-0093)
4.1	**Applicable Standards/Limits:** A. Visible Emissions Limitation **COMAR 26.11.06.02C(2)**, which prohibits visible emissions other than water in an uncombined form. This limitation applies to the VCU only. Exceptions. **COMAR 26.11.06.02A(2)** establishes that COMAR 26.11.06.02C does not apply to emissions during start-up, and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) the visible emissions are not greater than 40 percent opacity; and (b) the visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period. B. Control of VOC and HAP (Vapor Collection and Control Requirements) **COMAR 26.11.13.04A(1)(a), 40 CFR 60, Subpart XX, and 40 CFR 63, Subpart BBBBBB** which require vapor collection and control as follows: (1) The loading rack shall be equipped with a vapor collection and control system designed to collect the total organic compound vapors displaced from cargo tanks during product loading.

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(2) The vapor collection and control system shall control at least 90 percent of all vapors and emissions may not exceed 10 milligrams of VOC per liter of gasoline or VOC loaded into gasoline cargo tanks at the loading rack.

[Authority: COMAR 26.11.13.04A(1)(a), 40 CFR §60.502(a) and (b), §63.11088(a), §63.11092(d), Table 2, Items 1(a) and 1(b) of 40 CFR 63, Subpart BBBBBB, and ARA Permit to Construct issued April 10, 1996]

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

(1) **COMAR 26.11.13.05, 40 CFR 60, Subpart XX and 40 CFR 63, Subpart BBBBBB** which require the Permittee to load gasoline only into vapor tight gasoline cargo tanks that have been certified as capable of sustaining a pressure change of not more than 3 inches of water in 5 minutes when pressurized to a gauge pressure of 18 inches of water, or evacuated to a gauge pressure of 6 inches of water, during a test. **[Authority: COMAR 26.11.13.05A, 40 CFR §60.502(e), 40 CFR §63.11088(a), and Table 2, Item 1(d) of 40 CFR 63, Subpart BBBBBB]**

(2) ARA Permit to Construct No. 510-9-0093 issued on September 2, 2004 which requires that loadings of gasoline or VOC into tank trucks be limited to vapor tight tank trucks that have been certified as capable of sustaining a pressure change of not more than 1 inch of water (equivalent to a fugitive emission rate of 9 milligrams per liter of gasoline or VOC loaded) in 5 minutes when pressurized to a gauge pressure of 18 inches of water, or evacuated to a gauge pressure of 6 inches of water, during a test. **[Note: This also satisfies the requirements of 40 CFR 60.502(e) and COMAR 26.11.13.05A.]**

D. Control of VOC and HAP (Back Pressure and Leak Requirements)
COMAR 26.11.13.04A(1)(b), 40 CFR 60 Subpart XX, and 40 CFR 63, Subpart BBBBBB which require the Permittee design and operate the vapor collection and control system and the loading equipment so that during loading:

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

(2) No pressure-vacuum vent in the vapor collection and control

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system begins to open at a system pressure less than 4,500 pascals.

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

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

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

E. Control of VOC and HAP (Design and Operational Requirements)
COMAR 26.11.13.04A(1)(c), 40 CFR 60 Subpart XX, and 40 CFR 63, Subpart BBBBBB which specify the following design and operational requirements:

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

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

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

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

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

F. Operational Limitation
ARA Permit to Construct No. 510-9-0093 issued on September 2, 2004, which limits total gasoline and ethanol throughput loaded into tanks trucks to not greater than 500 million gallons in any consecutive 12-

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	month period.
4.2	**<u>Testing Requirements</u>:** A. <u>Visible Emissions Limitations</u> See Monitoring, Record Keeping, and Reporting Requirements. B. <u>Control of VOC and HAP (Vapor Collection and Control Requirements)</u> (1) The Permittee shall conduct performance tests on the VCU to determine total organic emissions per liter of gasoline loaded at the facility and to determine an overall control efficiency for VOC emissions caused by the facility's loading operations at least once every five years, during the period between May and September 15. Each five-year performance test for the VCU must be conducted no more than 60 months after the previous performance test for the VCU. (2) For the performance tests, the Permittee shall use Method 1009 of the Department's Technical Memorandum 91-01, "Test Methods and Equipment Specifications for Stationary Sources", which is incorporated by reference in COMAR 26.11.01.04C; the test methods and procedures in 40 CFR §60.503, except a reading of 500 parts per million shall be used to determine the level of leaks to be repaired under 40 CFR §60.503(b); or other methods approved by the Department. **[Authority: COMAR 26.11.13.04A(2)(a)(i) and (3)(b), and 40 CFR §63.11092(a)]** C. <u>Control of VOC and HAP (Vapor Tight Cargo Tank Requirements)</u> The annual certification test for gasoline cargo tanks shall consist of the following test methods: EPA Method 27, Appendix A-8, 40 CFR, Part 60 and Method 1007 of the Department's Technical Memorandum 91-01, "Test Methods and Equipment Specifications for Stationary Sources," which is incorporated by reference in COMAR 26.11.01.04C. The test shall be conducted using a time period (t) for the pressure and vacuum tests of 5 minutes. The initial pressure (P_i) for the pressure test shall be 18 inches of water, gauge. The initial vacuum (V_i) for the vacuum test shall be 6 inches of water, gauge. The maximum allowable pressure and vacuum changes (Δ p, Δ v) for all affected gasoline cargo tanks is 3 inches of water, or less, in 5 minutes. Any needed repairs shall be completed, and the cargo tank shall be retested within 15 days

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	of the original test date. **[Authority: COMAR 26.11.13.05B, 40 CFR §63.11088(d), and §63.11092(f)(1)]** D. Control of VOC and HAP (Back Pressure and Leak Requirements) (1) Testing for leak-tight conditions, as required in §A(1)(b)(ii) of this regulation, shall be conducted as prescribed in Method 1008 of the Department's Technical Memorandum 91-01, "Test Methods and Equipment Specifications for Stationary Sources" which is incorporated by reference in COMAR 26.11.01.04C. **[Authority: COMAR 26.11.13.04A(3)(a)]** (2) A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with ±2.5 mm of water precision, shall be calibrated and installed on the facility's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline cargo tank. **[Authority: 40 CFR §60.502(h), §60.503(d), 40 CFR §63.11088(a), and Table 2, Item 1(d) of 40 CFR 63, Subpart BBBBBB]** E. Control of VOC and HAP (Design and Operational Requirements) The loading rack and vapor collection and control systems are designed to operate as required. **[Authority: COMAR 26.11.03.06C]** F. Operational Limitation See Recordkeeping and Reporting Requirements.
4.3	**Monitoring Requirements:** A. Visible Emissions Limitations The Permittee shall observe the stack of the VCU for visible emissions as specified under Indicator 2 of the CAM Plan for the VCU. **[Authority: COMAR 26.11.03.06C and Indicator No. 2 of the CAM Plan for the VCU in Table IV-CAM of this permit.]** B. Control of VOC and HAP (Vapor Collection and Control Requirements) (1) When the VCU is used to control emissions from the loading rack, the Permittee shall comply with the CAM Plan for the VCU in Table IV-CAM of this permit and the following requirements: (a) The Permittee shall monitor the VCU for the presence of

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	a pilot flame as specified under Indicator No. 1 of the CAM Plan for the VCU. (b) The Permittee shall maintain a VCU monitoring and inspection plan that describes the Permittee's approach for meeting the following requirements: (i) The VCU shall be equipped to automatically prevent gasoline loading operations from beginning at any time that the pilot flame is absent as specified under Indicator No. 1 of the CAM Plan for the VCU. (ii) The Permittee shall verify, during each manned day of operation of the loading rack, the proper operation of the assist-air blower and the vapor line valve. Verification shall be through visual observation, or through an automated alarm or shutdown system that monitors system operation. A manual or electronic record of the start and end of a shutdown event may be used. (iii) The Permittee shall perform semi-annual preventive maintenance inspections of the VCU, including the automated alarm or shutdown system, according to the recommendations of the manufacturer of the system and as specified under Indicator No. 1 of the CAM Plan for the VCU. (iv) The monitoring and inspection plan shall specify conditions that would be considered malfunctions of the VCU during the inspections or automated monitoring, describe specific corrective actions that will be taken to correct any malfunction, and define what the Permittee owner or operator would consider to be a timely repair for each potential malfunction. (c) Malfunctions that are discovered shall not constitute a violation of the emission standard in 40 CFR §63.11088(a) if corrective actions as described in the

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monitoring and inspection plan are followed. The Permittee must:

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

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

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

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

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

[Authority: 40 CFR §63.11092(b)(1)(iii)(B)(*1*) and (*2*)(*i*) through (*iv*), §63.11092(d)(4) and the CAM Plan for the VCU in Table IV-CAM of this permit.]

C. Control of VOC and HAP (Vapor Tight Cargo Tank Requirements)
The Permittee shall assure that loadings of gasoline or VOC into cargo tanks are limited to vapor-tight cargo tanks using the following procedures:

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

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

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

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	(4) The Permittee shall take steps to assure that any nonvapor-tight cargo tank will not be reloaded at the facility until vapor tightness documentation for that tank is obtained. (5) Alternative procedures may be approved by the Department as specified in 40 CFR §60.502(e)(6). **[Authority: COMAR 26.11.13.05D(2), 40 CFR §60.502(e)(1), (2), (3), (5) and (6), 40 CFR §63.11088(a), and Table 2, Item 1(d) of 40 CFR 63, Subpart BBBBBB]** D. Control of VOC and HAP (Back Pressure and Leak Requirements) (1) Each calendar month, the vapor collection system, the vapor processing system, and the loading rack handling gasoline shall be inspected during the loading of gasoline cargo tanks for total organic compounds liquid or vapor leaks. Each detection of a leak shall be recorded, and the source of the leak repaired within 15 calendar days after it is detected. **[Authority: COMAR 26.11.13.04A(3)(a), 40 CFR §60.502(j), 40 CFR §63.11088(a), Table 2, Item 1(d) of 40 CFR 63, Subpart BBBBBB, and Indicator No. 4 of the CAM Plan for the VCU in Table IV-CAM of this permit.]** (2) Each calendar month, the Permittee shall check the back pressure in the vapor collection system during loading of cargo tanks. **[Authority: COMAR 26.11.03.06C and Indicator No. 3 of the CAM Plan for the VCU in Table IV-CAM of this permit.]** E. Control of VOC and HAP (Design and Operational Requirements) The loading rack and vapor collection and control systems are designed to operate as required. **[Authority: COMAR 26.11.03.06C]** F. Operational Limitation See Record Keeping and Reporting Requirements.
4.4	**Record Keeping Requirements:** A. Visible Emissions Limitations The Permittee shall maintain records of visible emissions observations as specified under Indicator 2 of the CAM Plan for the VCU. **[Authority: COMAR 26.11.03.06C and Indicator No. 2 of the CAM Plan for the VCU in Table IV-CAM of this permit.]** B. Control of VOC and HAP (Vapor Collection and Control Requirements)

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(1) The Permittee shall keep the following records for the VCU:

(a) Copies of all VCU performance test results.

(b) Records of all maintenance and repairs performed on the VCU.

(c) An up-to-date, readily accessible copy of the VCU monitoring and inspection plan required under §63.11092(b)(1)(iii)(B)(*2*).

(d) Records, as specified in the VCU monitoring and inspection plan required under 40 CFR §63.11092(b)(1)(iii)(B)(*2*)(v), of any system malfunction and any activation of the automated alarm or shutdown system with a written entry into a logbook or other permanent form of record. Such record shall also include a description of the corrective action taken and whether such corrective actions were taken in a timely manner, as defined in the VCU monitoring and inspection plan, as well as an estimate of the amount of gasoline loaded during the period of the malfunction.

[COMAR 26.11.13.04A(2)(a)(iii) and (b) and 40 CFR §63.11092(b)(1)(iii)(B)(*2*)(v) and the CAM Plan for the VCU in Table IV-CAM of this permit.]

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

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

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

(a) Test title: Gasoline Delivery Tank Pressure Test – EPA Reference Method 27 or Method 1007 of the

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Department's Technical Memorandum 91-01

(b) Tank owner and address.
(c) Tank identification number.
(d) Testing location.
(e) Date of test.
(f) Date and type of repair, if applicable.
(g) Date of retest, if applicable.
(h) Tester name and signature.
(i) Witnessing inspector, if any: Name, signature, and affiliation.
(j) Vapor tightness repair: nature of repair work and when performed in relation to vapor tightness testing.
(k) Test results: Actual pressure change in 5 minutes, millimeters of water (average for two (2) runs).
(l) Pressure testing: the initial and final test pressure, the time of each reading, and the actual pressure change.
(m) Vacuum testing: the initial and final test vacuum, the time of each reading, and the actual vacuum change.
(n) Number of leaks found with an instrument and leak definition.

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

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

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

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

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	record with certifying signatures. **[Authority: 40 CFR 40 CFR §63.11088(f) and §63.11094(c)]** D. Control of VOC and HAP (Back Pressure and Leak Requirements) The Permittee shall maintain the following records: (1) Monthly leak inspection records including, as a minimum, the following information: (a) Date of inspection. (b) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak. (c) Leak determination method. (d) Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days). (e) Inspector name and signature. **[Authority: COMAR 26.11.13.04A(3)(a), 40 CFR §60.502(j), 40 CFR §63.11088(a), Table 2, Item 1(d) of 40 CFR 63, Subpart BBBBBB, and Indicator No. 4 of the CAM Plan for the VCU in Table IV-CAM of this permit.]** (2) Monthly records of the back pressure reading in the vapor collection system. **[Authority: COMAR 26.11.03.06C and Indicator No. 3 of the CAM Plan for the VCU in Table IV-CAM of this permit.]** E. Control of VOC and HAP (Design and Operational Requirements) The loading rack and vapor collection and control systems are designed to operate as required. **[Authority: COMAR 26.11.03.06C]** F. Operational Limitation The Permittee shall keep monthly records to document that total gasoline and ethanol throughput loaded into tank trucks for each consecutive 12 months does not exceed 500 million gallons. **[Authority: ARA Permit to Construct No. 510-9-0093 issued on September 2, 2004]**
4.5	**Reporting Requirements:** A. Visible Emissions Limitations The Permittee shall submit reports of visible emissions observations as specified under Indicator 2 of the CAM Plan for the VCU. **[Authority: COMAR 26.11.03.06C and Indicator No. 2 of the CAM Plan for the VCU in Table IV-CAM]**

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	B. Control of VOC and HAP (Vapor Collection and Control Requirements) (1) For the VCU, the Permittee shall submit to the Department the following information: (a) Written notification to conduct a performance test on the VCU at least 60 calendar days before the performance test is scheduled. The notification shall include the site-specific test plan required under COMAR 26.11.13.04A(2)(a)(ii) and 40 CFR §63.7(c). (b) Results of each VCU performance test not more than 60 days after each test date. **[Authority: COMAR 26.11.13.04A(2)(a)(ii) and (iii), 40 CFR §63.9(e), and. §63.11093(c)]** (2) The Permittee shall submit an excess emissions report to the Department at the time the semiannual compliance report is submitted as specified in 40 CFR §63.11095(b). The report shall include the following information: (a) Each exceedance or failure to maintain, as appropriate, a monitored operating parameter value determined under 40 CFR §63.11092(b). The report shall include the monitoring data for the days on which exceedances or failures to maintain have occurred, and a description and timing of the steps taken to repair or perform maintenance on the vapor collection and processing systems or the continuous monitoring system (CMS). (b) The Permittee shall submit all information concerning out-of-control periods for the CEMS, including start and end dates and hours and descriptions of corrective actions taken. (c) Each instance in which malfunctions discovered during the monitoring and inspections required under 40 CFR §63.11092(b)(1)(iii)(B)(*2*) for the VCU were not resolved according to the necessary corrective actions described in the VCU monitoring and inspection plan. The report shall include a description of the malfunction and the timing of the steps taken to correct the malfunction. **[Authority: 40 CFR §63.8(c)(8), §63.11095(b)(3) and (4), and the CAM Plan for the VCU in Table IV-CAM of this permit.]**

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

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

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

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

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

(b) Each reloading of a non-vapor-tight gasoline cargo tank at the facility before vapor tightness documentation for that cargo tank is obtained by the facility in accordance with 40 CFR §63.11094(b).

[Authority: 40 CFR §63.11095(b)(1) and (2)]

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

The Permittee shall include leak inspection and back pressure records in the semiannual compliance report and excess emissions report as specified in 40 CFR §63.11095(a) and (b). **[Authority: 40 CFR §63.11088(f), §63.11095(a) and (b), and Indicator Nos. 3 and 4 of the CAM Plan for the VCU in Table IV-CAM of this permit.]**

Table IV – 4	
	E. Control of VOC and HAP (Design and Operational Requirements) The loading rack and vapor collection and control systems are designed to operate as required. **[Authority: COMAR 26.11.03.06C]** F. Operational Limitation The Permittee shall report incidences of excess emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations". **[Authority: COMAR 26.11.03.06C]**

Table IV – CAM **CAM Plan for the Vapor Combustion Unit (VCU)**		
40 CFR, Part 64 Requirement	**Indicator 1**	**Indicator 2**
Indicator 64.4(a)(1)	Photoelectric eye – Presence of flame	Visible emissions observations during loading operation
Indicator Range(s) 64.4(a)(2)	An excursion is defined as a failure for the pilot detector to shutdown the VCU when there is no flame. All excursions shall be reported to MDE in semi-annual monitoring reports.	An excursion occurs if visible emissions observed. All excursions will be reported to the MDE in semi-annual monitoring reports. An excursion will trigger an investigation, corrective action, and a reporting requirement.
Performance Criteria 64.4(a)(3)		
A. Data Representativeness	The pilot detector controls the operation of the VCU. When no pilot flame is detected, the VCU cannot start-up and if no flame is detected during operation, the VCU automatically shuts down and loading ceases.	The observer looks for visible emissions just above the exhaust outlet of the combustor.
B. Verification of Operational Status	The pilot detector is connected to an interlock system that ensures the VCU cannot operate, and trucks cannot be loaded if no flame is detected.	N/A
C. QA/QC Practices and Criteria	VCU receives preventive maintenance quarterly. During each visit the following items are checked to ensure proper pilot operation: • Pull and clean pilot strainer • Pull and clean assist gas strainer • Check all indicator lights and sensors, replace if faulty • Inspect spark ignition systems • Ensure burner scanner is operating properly, blocking scanner and starting unit. Unit must shutdown on flame failure • Complete start-up procedure checked	The observers are trained on procedures in making an observation and record keeping requirements.

D. Monitoring Frequency	Pilot detector operates continuously.	At least once per week, the Permittee shall observe the stack of the VCU for visible emissions. An operator familiar with the maintenance and operation of the VCU shall conduct each observation for a 1-minute period.
E. Data Collection Procedures	Results of inspection and preventive maintenance of the pilot operations are manually recorded and maintained onsite.	Results of observations will be manually recorded and maintained on site. Records will include date, time, and result of observation.
F. Averaging Procedures	N/A	N/A

Table IV – CAM(continued)
CAM Plan for the Vapor Combustion Unit

Part 64 Requirement	Indicator 3	Indicator 4	Indicator 5
Indicator 64.4(a)(1)	Equipment leaks	Vapor collection line back pressure	Work Practice - Preventive maintenance
Indicator Range(s) 64.4(a)(2)	Once each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline or VOC will be inspected during the loading of tank trucks for total organic compounds liquid or vapor leaks. The detection method will be sight, sound, or smell. An excursion is defined as detection of a leak by sight, sound, or smell for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detecting the leak. All excursions and corrective actions taken will be reported to the MDE in semi-annual monitoring reports.	Once each calendar month, the vapor collection line back pressure will be checked during the loading of trucks. An excursion is defined as when the pressure gauge reading shows back pressure to be greater than 18 inches of water column. An excursion will trigger an investigation, corrective action, and a reporting requirement. All excursions will be reported to the MDE in semi-annual monitoring reports.	Proper operation is verified by performing preventive maintenance as recommended by VCU manufacturer quarterly. An excursion occurs if preventive maintenance is not performed or documented. All excursions will be reported in semi-annual monitoring reports.
Performance Criteria 64.4(a)(3)			
A.Data Representa-tiveness	The terminal operations personnel will be trained on the procedures to detect, record, and initiate corrective actions.	A pressure gauge that is attached to a spool piece that is inserted between the vapor line connection of the tanker and the terminal's vapor collection line is used to measure back pressure. The gauge measures pressure within ± 0.2 inch of water column.	Proper operation is verified by trained personnel or a service person using a preventive maintenance checklist that is based on recommendations provided by the VCU manufacturer.
B.Verification of Operational Status	N/A	Monthly check on loading bay with manual log entry.	N/A
C.QA/QC Practices and Criteria	The operations' personnel responsible for performing the monthly inspections will be trained on the procedures to	Preventive maintenance is performed on pressure gauge quarterly and is calibrated or	Service persons are trained on inspection and maintenance procedures.

	follow. The terminal will maintain a record of employees trained to perform the inspections.	replaced at least once per year.	
D.Monitoring Frequency	Monthly	Monthly	Quarterly
E.Data Collection Procedures	Manual records of results of inspections, leaks found, and leaks repaired.	Monthly readings with manual entry.	Results of inspection and maintenance performed during preventive maintenance are manually recorded and maintained on site.
F.Averaging Procedures	N/A	N/A	N/A

Table IV – 5	
5.0	**Emissions Unit Number(s):** Facility Wide Requirements
5.1	**Applicable Standards/Limits:** 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.
5.2	**Testing Requirements:** Control of HAP See Monitoring, Record Keeping and Reporting Requirements.
5.3	**Monitoring Requirements:** Control of HAP The Permittee shall comply with the following monitoring requirements: (1) The Permittee must, at all times, operate and maintain the bulk gasoline terminal, including any associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Department, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of

Table IV – 5	
	operation and maintenance records, and inspection of the premises. **[Authority: 40 CFR §63.11085(a)]** (2) The Permittee shall perform a monthly leak inspection of all equipment in gasoline service, as defined in 40 CFR §63.11100, in accordance with the following requirements: (a) For this inspection, detection methods incorporating sight, sound and smell are acceptable. (b) A logbook shall be used and shall be signed by the Permittee at the completion of each inspection. A section of the logbook shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the premises. (c) Each detection of a liquid or vapor leak shall be recorded in the logbook. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed with 15 calendar days after detection of each leak, except as provided in 40 CFR §63.11089(d). (d) Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The Permittee shall provide in the semiannual report specified in 40 CFR §63.11095(b), the reason(s) why the repair was not feasible and the date each repair was completed. **[Authority: 40 CFR §63.11089(a) through (d)]**
5.4	**<u>Record Keeping Requirements</u>:** <u>Control of HAP</u> (1) The Permittee shall maintain the following operation and maintenance records: (a) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. (b) Records of actions taken during periods of malfunction to

Table IV – 5	
	minimize emissions in accordance with 40 CFR §63.11085(a), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. **[Authority: 40 CFR §63.11094(g)(1) and (2)]** (2) The Permittee shall maintain the following leak inspection records: (a) The Permittee shall prepare and maintain a record describing the types, identification numbers, and locations of all equipment in gasoline service. If the Permittee implements an instrument program under 40 CFR §63.11089, the record shall contain a full description of the program. (b) The Permittee shall maintain a logbook for leak inspections and record the following information for each leak that is detected: (i) The equipment type and identification number. (ii) The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell). (iii) The date the leak was detected and the date of each attempt to repair the leak. (iv) Repair methods applied in each attempt to repair the leak. (v) "Repair delayed" and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak. (vi) The expected date of successful repair of the leak if the leak is not repaired within 15 days. (vii) The date of successful repair of the leak. **[Authority: 40 CFR §63.11089(g), 40 CFR §63.11094(d) and (e)]**

Table IV – 5	
5.5	**Reporting Requirements:** Control of HAP The Permittee shall submit a semiannual compliance report to the Department as specified in 40 CFR §63.11095(a). The report shall include the following information: (1) The number, duration, and a brief description of each type of malfunction which occurred during the reporting period, and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the Permittee during a malfunction of an affected source to minimize emissions in accordance with 40 CFR §63.11085(a), including actions taken to correct a malfunction. **[Authority: 40 CFR §63.11095(d)]** (2) For equipment leak inspections, the following information: (a) The number of equipment leaks not repaired within 15 days after detection. **[Authority: 40 CFR §63.11095(a)(3)]** (b) An excess emissions report to the Department at the time the semiannual compliance report is submitted that includes the following information for each occurrence of an equipment leak for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detection: (i) The date on which the leak was detected; (ii) The date of each attempt to repair the leak; (iii) The reasons for the delay of repair; and (iv) The date of successful repair. **[Authority: 40 CFR §63.11095(b)(5)]**

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. 6 Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;

The containers are subject to COMAR 26.11.19.09D, which requires that the Permittee control emissions of volatile organic compounds (VOC) from cold degreasing operations by meeting the following requirements:

(a) COMAR 26.11.19.09D(2)(b), which establishes that the Permittee shall not use any VOC degreasing material that exceeds a vapor pressure of 1 mm Hg at 20 °C;

(b) COMAR 26.11.19.09D(3)(a—d), which requires that the Permittee implement good operating practices designed to minimize spills and evaporation of VOC degreasing material. These practices, which shall be established in writing and displayed such that they are clearly visible to operators, shall include covers (including water covers), lids, or other methods of minimizing evaporative losses, and reducing the time and frequency during which parts are cleaned;

(c) COMAR 26.11.19.09D(4), which prohibits the use of any halogenated VOC for cold degreasing.

The Permittee shall maintain on site for at least five (5) years, and shall make available to the Department upon request, the following records of operating data:

(a) Monthly records of the total VOC degreasing materials used; and

(b) Written descriptions of good operating practices designed to minimize spills and evaporation of VOC degreasing materials.

(2) ✓ Brazing, soldering, or welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals and not directly related to plant maintenance, upkeep and repair or maintenance shop activities;

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

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

The Permittee maintains the following propane storage tanks:

- Tank No. 31 - One (1) 1000-gallon propane storage tank.
- Tank No. 34 – One (1) 100-gallon propane storage tank.

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

The Permittee maintains the following distillate storage tanks:

- Tank No. 4 – One (1) 1,782,312-gallon (42,436-barrel) distillate storage tank.
- Tank No. 8 – One (1) 4,655,196-gallon (110,838-barrel) distillate storage tank.
- Tank No. 12 – One (1) 4,927,860-gallon (117,330-barrel) distillate storage tank.
- Tank No. 13 – One (1) 1,755,390-gallon (41,795-barrel) distillate storage tank.

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

No. 1 Tank No. 20 – One (1) 550-gallon additive storage tank.

No. 1 Tank No. 21 – One (1) 1,000-gallon additive storage tank.

No. 1 Tank No. 22 – One (1) 2,000-gallon additive storage tank.

No. 1 Tank No. 27 – One (1) 2,000-gallon additive storage tank.

SECTION VI STATE-ONLY ENFORCEABLE CONDITIONS

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

1. Applicable Regulations:

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

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

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

2. Record Keeping and Reporting:

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

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

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

Calculation of Truck Loading Losses
Baltimore Terminal
500 MM gallons gasoline PTE

Assumptions:

Saturation Factor	1.0
Fugitive Loading Losses	9.0 mg/L
Control Device Rating	10.0 mg/L

Gasoline (E10) & Ethanol (E95)

	Throughput (Mgal)	Avg Temp (°F)	RVP (psia)	TVP (psia)	MolWt (lb/lbmol)	L_L (lb/Mgal)	Uncontrolled Emissions (lb)	Loading Losses (lb)	Controlled Losses (lb)
Jan	41,667	45.74	15.0	6.234	57.835	8.890	370,406	3,333.7	3,477.2
Feb	41,667	47.40	15.0	6.437	57.835	9.149	381,194	3,430.7	3,477.2
Mar	41,667	51.90	15.0	7.012	57.835	9.879	411,637	3,704.7	3,477.2
Apr	41,667	56.45	13.5	6.782	61.093	10.004	416,817	3,751.4	3,477.2
May	41,667	61.15	7.0	3.566	68.001	5.802	241,752	2,175.8	3,477.2
Jun	41,667	65.39	7.0	3.884	68.001	6.268	261,176	2,350.6	3,477.2
Jul	41,667	67.31	7.0	4.035	68.001	6.488	270,326	2,432.9	3,477.2
Aug	41,667	66.37	7.0	3.960	68.001	6.379	265,804	2,392.2	3,477.2
Sep	41,667	62.84	11.5	6.395	64.306	9.808	408,681	3,678.1	3,477.2
Oct	41,667	57.17	13.5	6.875	61.093	10.127	421,946	3,797.5	3,477.2
Nov	41,667	52.41	15.0	7.080	57.835	9.965	415,200	3,736.8	3,477.2
Dec	41,667	47.76	15.0	6.482	57.835	9.206	383,597	3,452.4	3,477.2
Avg/Total	500,000	56.82	11.8	5.728	62.306	8.497	4,248,536	38,236.8	41,727.0
ozone t-put	**125,000**						**797,306.39**	**7,175.76**	**10,431.7**
ozone lb/da	**191.4**							**ozone lbs/yr**	**17,607.5**
								lbs/yr	**79,963.8**
								TPY	**40.0**

Distillate Fuel Oil #2

	Throughput (Mgal)	Avg Temp (°F)	TVP (psia)	MolWt (lb/lbmol)	L_L (lb/Mgal)	Uncontrolled Emissions (lb)	Loading Losses (lb)	Controlled Losses (lb)
Jan	15,000	45.7	0.0040	130.000	0.013	192	1.7	185.9
Feb	15,000	47.4	0.0042	130.000	0.013	202	1.8	196.3
Mar	15,000	51.9	0.0049	130.000	0.016	234	2.1	227.1
Apr	15,000	56.4	0.0057	130.000	0.018	271	2.4	262.5
May	15,000	61.1	0.0067	130.000	0.021	313	2.8	303.9
Jun	15,000	65.4	0.0077	130.000	0.024	357	3.2	346.2
Jul	15,000	67.3	0.0082	130.000	0.025	378	3.4	366.9
Aug	15,000	66.4	0.0080	130.000	0.025	368	3.3	356.6
Sep	15,000	62.8	0.0071	130.000	0.022	330	3.0	320.2
Oct	15,000	57.2	0.0059	130.000	0.018	277	2.5	268.5
Nov	15,000	52.4	0.0050	130.000	0.016	238	2.1	230.8
Dec	15,000	47.8	0.0043	130.000	0.014	205	1.8	198.7
Avg/Total	180,000	56.8	0.006	130.000	0.019	3,365	**30.3**	**3,263.6**
ozone t-put	**45,000.0**					**1102.731**	**9.925**	**1,069.6**
ozone lb/da	**11.7**						**ozone lbs/yr**	**1,079.6**
							lbs/yr	**3,293.9**
							TPY	**1.6**

	Nox	CO	VOC-Fug	VOC-VCU			
Emission Factors	**0.033** lb/1,000 gals	**0.083** lb/1,000 gals	**0.0765** lb/1,000 gals	**0.0835** lb/1,000 gals		**Control = Efficiency**	**1-Controlled Losses / Uncontrolled Losses**
Ave. Daily Emissions	**45** lb/day	**114** lb/day	**77.997** lb/day	**113.389** lb/day		**Control = Efficiency**	**99.02%**
Annual Emissions	**16,500** lb/year	**41,500** lb/year	**38,267** lb/year	**44,991** lb/year			
Annual Emissions	**8.250** Tons/year	**20.750** Tons/year	**19.134** Tons/year	**22.495** Tons/year	**41.629** Total TPY		

Citgo Petroleum
Baltimore, MD

VOC Emissions Summary

500 MM gallon PTE

	Tank 1	Tank 2	Tank 3	Tank 4	Tank 5	Tank 6	Tank 8	Tank 9	Tank 10	Tank 11	Tank 12	Tank 13	Tank 15	Tanks	Tanks	Tanks	Loading Racks							
	EU-1	EU-2	EU-3	EU-4	EU-5	EU-6	EU-8	EU-9	EU-10	EU-11	EU-12	EU-13	EU-15	TOTAL	Alt O S	Alt O S	EU-LR	EU-LR		EU-LR	EU-LR			
Product	Regular Unleaded	Premium Unleaded	Premium Unleaded	Low Sulfur Diesel	Premium Unleaded	Additive	Low Sulfur Diesel	Regular Unleaded	Regular Unleaded	Denatured Ethanol	Fuel Oil #2	Fuel Oil #2	Commingle	TOTAL	Tank Landing Losses	Tank Cleaning Losses	Gasoline	#2 Fuel Oil / Diesel	Docks	Additives	Truck Fugitives	Fugitives	TOTAL	TOTAL
Speciation Key	REFGAS	REFGAS	REFGAS	DIESEL	REFGAS	KERO	DIESEL	REFGAS	REFGAS	ETHANOL	DIESEL	DIESEL	REFGAS		REFGAS	REFGAS	REFGAS	DIESEL	DIESEL	KERO	REFGAS	REFGAS	(lb/yr)	(TPY)
Total VOC Emissions (lb/yr)	1,029	8,752	1,973	1,855	5,850	64	4,089	4,593	5,320	1,941	4,346	1,953	2,620	44,385	20,442	18,575	41,727	3,294	70	3	38,239	1,030	167,765	83.88
Total VOC Emissions (TPY)	0.51	4.38	0.99	0.93	2.93	0.03	2.04	2.30	2.66	0.97	2.17	0.98	1.31	22	10.22	9.29	20.86	1.65	0.04	0.00	19.12	0.51		
Total VOC Emissions (lb/day)	2.82	23.98	5.41	5.08	16.03	0.18	11.20	12.58	14.58	5.32	11.91	5.35	7.18	122	56	51	114.32	9.02	0.19	0.01	104.76	2.82		
Ozone Season (lbs)	257.25	2188.00	493.25	463.75	1462.50	16.00	1022.25	1148.25	1330.00	485.25	1086.50	488.25	655.00	10,441	11,096	11,096	59	0.08	0.194	0.0000	77.2			
Ozone Season (lb/day)	2.80	23.78	5.36	5.04	15.90	0.17	11.11	12.48	14.46	5.27	11.81	5.31	7.12	113	121	121	70.00	0.08	0.16	0.00	90.80	2.82		
VOC HAP Emissions (lb/yr):																								
Isoctane (2,2,4 Trimethylpentane)	7.20	61.26	13.81	<0.01	40.95	<0.01	<0.01	32.15	37.24	<0.01	<0.01	<0.01	18.34	192.62	210.96	210.96	292.09	<0.01	<0.01	<0.01	267.67	7.21	778	0.39
Benzene	4.12	35.01	7.89	0.56	23.40	0.09	1.24	18.37	21.28	<0.01	1.32	0.59	10.48	113.87	124.35	124.35	166.91	1.00	0.02	<0.01	152.96	4.12	449	0.22
Ethylbenzene	1.03	8.75	1.97	0.93	5.85	0.28	2.04	4.59	5.32	<0.01	2.17	0.98	2.62	33.92	36.54	36.54	41.73	1.65	0.04	0.01	38.24	1.03	119	0.06
Hexane (-n)	14.41	122.53	27.62	0.11	81.90	0.18	0.25	64.30	74.48	<0.01	0.26	0.12	36.68	386.15	422.83	422.83	584.18	0.20	<0.01	<0.01	535.35	14.42	1557	0.78
Toluene	11.32	96.27	21.70	6.68	64.35	0.88	14.72	50.52	58.52	<0.01	15.65	7.03	28.82	347.64	376.46	376.46	459.00	11.86	0.25	0.04	420.63	11.33	1280	0.64
Xylenes (Mixed Isomers)	4.12	35.01	7.89	17.25	23.40	0.57	38.03	18.37	21.28	<0.01	40.42	18.16	10.48	224.50	234.98	234.98	166.91	30.63	0.65	0.03	152.96	4.12	590	0.30
Methyl Tertiary Butyl Ether (MTBE	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	0.00	0.00	0.00	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	0	0.00
VOC HAP Emissions (tons/yr):																								
Isoctane (2,2,4 Trimethylpentane)	0.00	0.03	0.00	0.00	0.02	0.00	0.00	0.02	0.02	0.00	0.00	0.00	0.01	0.10	0.11	0.11	0.15	0.00	0.00	0.00	0.13	0.00	778	0.39
Benzene	0.00	0.02	0.00	0.00	0.01	0.00	0.00	0.01	0.01	<0.01	0.00	0.00	0.01	0.06	0.06	0.06	0.08	0.00	0.00	0.00	0.08	0.00	449	0.22
Ethylbenzene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	<0.01	0.00	0.00	0.00	0.02	0.02	0.02	0.02	0.00	0.00	0.00	0.02	0.00	119	0.06
Hexane (-n)	0.01	0.06	0.01	0.00	0.04	0.00	0.00	0.03	0.04	<0.01	0.00	0.00	0.02	0.19	0.21	0.21	0.29	0.00	0.00	0.00	0.27	0.01	1557	0.78
Toluene	0.01	0.05	0.01	0.00	0.03	0.00	0.01	0.03	0.03	<0.01	0.01	0.00	0.01	0.17	0.19	0.19	0.23	0.00	0.00	0.00	0.21	0.01	1280	0.64
Xylenes (Mixed Isomers)	0.00	0.02	0.00	0.01	0.01	0.00	0.02	0.01	0.01	<0.01	0.02	0.01	0.01	0.11	0.12	0.12	0.08	0.02	0.00	0.00	0.08	0.00	590	0.30
Methyl Tertiary Butyl Ether (MTBE	<0.01	<0.01	<0.01	0.00	<0.01	0.00	0.00	<0.01	<0.01	0.00	0.00	0.00	<0.01	0.00	0.00	0.00	<0.01	0.00	0.00	0.00	<0.01	<0.01	0	0.00
																						Total HAPs:	4,773	2.39

APPENDIX H. CHECKLIST OF INSIGNIFICANT ACTIVITIES

MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION
RENEWAL TITLE V APPLICATION INSIGNIFICANT ACTIVITIES LIST

III. Check-off List of Emissions Units and Activities Exempt from the Part 70 Permit Application

Insignificant Activities

Place a check mark beside each type of emissions unit or activity that is located at the facility. Where noted, please indicate the number of that type of emissions unit or activity located at the facility.

(1) No. ___ Fuel burning equipment using gaseous fuels or no. 1 or no. 2 fuel oil, and having a heat input less than 1,000,000 Btu (1.06 gigajoules) per hour;

(2) No. ___ Fuel-burning equipment using solid fuel and having a heat input of less than 350,000 Btu (0.37 gigajoule) per hour;

(3) No. ___ Stationary internal combustion engines with less than 500 brake horsepower (373 kilowatts)of power output

(4) ___ Space heaters utilizing direct heat transfer and used solely for comfort heat;

(5) ___ Water cooling towers and water cooling ponds unless used for evaporative cooling of water from barometric jets or barometric condensers, or used in conjunction with an installation requiring a permit to operate;

(6) No. ___ Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;

(7) ____ Commercial bakery ovens with a rated heat input capacity of less than 2,000,000 Btu per hour;

(8) ___ Kilns used for firing ceramic ware, heated exclusively by natural gas, liquefied petroleum gas, electricity, or any combination of these;

(9) ___ Confection cookers where the products are edible and intended for human consumption;

(10) ___ Die casting machines;

(11)___ Photographic process equipment used to reproduce an image upon sensitized material through the use of radiant energy;

(12)___ Equipment for drilling, carving, cutting, routing, turning, sawing, planing, spindle sanding, or disc sanding of wood or wood products;

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(13)___ Brazing, soldering, or welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals and not directly related to plant maintenance, upkeep and repair or maintenance shop activities;

(14)___ Equipment for washing or drying products fabricated from metal or glass, provided that no VOC is used in the process and that no oil or solid fuel is burned;

(15)___ Containers, reservoirs, or tanks used exclusively for electrolytic plating work, or electrolytic polishing, or electrolytic stripping of brass, bronze, cadmium, copper, iron, lead, nickel, tin, zinc, and precious metals;

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

(a) ___ Dipping operations for applying coatings of natural or synthetic resins that contain no VOC;

(b) ___ Dipping operations for coating objects with oils, waxes, or greases, and where no VOC is used;

(c) ___ Storage of butane, propane, or liquefied petroleum, or natural gas;

(d) No. ___ Storage of lubricating oils:

(e) No. ___ Unheated storage of VOC with an initial boiling point of 300 °F (

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

(g) No. ___ Storage of motor vehicle gasoline and having individual tank capacities of 2,000 gallons (7.6 cubic meters) or less;

(h) No. ___ 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;

(17) ___ Gaseous fuel-fired or electrically heated furnaces for heat treating glass or metals, the use of which does not involve molten materials;

(18) Crucible furnaces, pot furnaces, or induction furnaces, with individual capacities of 1,000 pounds (454 kilograms) or less each, in which no sweating or distilling is conducted, or any fluxing is conducted using chloride, fluoride,

or ammonium compounds, and from which only the following metals are poured or in which only the following metals are held in a molten state:

(a) ___ Aluminum or any alloy containing over 50 percent aluminum, if no gaseous chloride compounds, chlorine, aluminum chloride, or aluminum fluoride is used;

(b) ___ Magnesium or any alloy containing over 50 percent magnesium;

(c) ___ Lead or any alloy containing over 50 percent lead;

(d) ___ Tin or any alloy containing over 50 percent tin;

(e) ___ Zinc or any alloy containing over 50 percent zinc;

(f) ___ Copper;

(g) ___ Precious metals;

(19)___ Charbroilers and pit barbecues as defined in COMAR 26.11.18.01 with a total cooking area of 5 square feet (0.46 square meter) or less;

(20) ___ First aid and emergency medical care provided at the facility, including related activities such as sterilization and medicine preparation used in support of a manufacturing or production process;

(21) ___ Certain recreational equipment and activities, such as fireplaces, barbecue pits and cookers, fireworks displays, and kerosene fuel use;

(22) ___ Potable water treatment equipment, not including air stripping equipment;

(23)___ Firing and testing of military weapons and explosives;

(24)___ Emissions resulting from the use of explosives for blasting at quarrying operations and from the required disposal of boxes used to ship the explosive;

(25)___ Comfort air conditioning subject to requirements of Title VI of the Clean Air Act;

(26)___ Grain, metal, or mineral extrusion presses;

(27)___ Breweries with an annual beer production less than 60,000 barrels;

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(28)___ Natural draft hoods or natural draft ventilators that exhaust air pollutants into the ambient air from manufacturing/industrial or commercial processes;

(29)____ Laboratory fume hoods and vents;

(30) No. ___ Sheet-fed letter or lithographic printing press(es) with a cylinder width of less than 18 inches;

For the following, attach additional pages as necessary:

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

No. 1 Tank No.- 19, Additive

No. 1 Tank No. - 20, Additive

No. 1 Tank No. - 21, Additive

No. 1 Tank No. - 22, Additive

No. 1 Tank No. - 23, Additive

No. 1 Tank No. - 27 Additive

(32) any other emissions unit at the facility which is not subject to an applicable requirement of the Clean Air Act (list and describe):

No. ___ _____

No. ___ _____

No. ___ _____