

**LANE REGIONAL AIR PROTECTION AGENCY
TITLE V OPERATING PERMIT REVIEW REPORT**

Lane Regional Air Protection Agency
1010 Main Street
Springfield, Oregon 97477

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ABBREVIATIONS THAT MAY APPEAR IN THIS REVIEW REPORT

AMB	Ambient
AQMA	Air quality management area
ASTM	American Society of Testing and Materials
BDT	Bone dry ton
CEMS	Continuous emissions monitoring system
CFR	Code of Federal Regulations
CMS	Continuous monitoring system
CO	Carbon monoxide
COMPL	Compliance
COMS	Continuous opacity monitoring system
COND	Condition
CRED	Credit
DEQ	Oregon Department of Environmental Quality
dscf	dry standard cubic feet
EF	Emission factor
EPA	United State Environmental Protection Agency
EU	Emissions unit
FCAA	Federal Clean Air Act
gr/dscf	grains per dry standard cubic feet
HAP	Hazardous air pollutant
ID	Identification code
I&M	Inspection and maintenance
LRAPA	Lane Regional Air Pollution Authority
MB	Material balance
Mlb	1000 pounds
MON	Monitoring
NA	Not applicable
NESHAP	National emission standard for hazardous air pollutants
NO _x	Oxides of nitrogen
NSPS	New source performance standard
NSR	New source review
O ₂	Oxygen
OAR	Oregon Administrative Rules
ORS	Oregon Revised Statutes
O&M	Operation and maintenance
Pb	Lead
PCD	Pollution Control Device
PM	Particulate matter
PM ₁₀	Particulate matter less than 10 microns in size
PSD	Prevention of significant deterioration
PSEL	Plant Site Emission Limit
SCHED	Schedule
SPEC	Special
SO ₂	Sulfur dioxide
ST	Source test
VE	Visible emissions
VMT	Vehicle mile traveled
VOC	Volatile organic compound
VOL	Volatile organic liquid

INTRODUCTION

1. This is an existing facility subject to the Title V federal operating permit program. The facility is a major source as defined in OAR 340-200-0020(63) and must operate according to a federally enforceable permit.

In accordance with OAR 340-218-0120(1)(f), this review report is intended to provide the legal and factual basis for the draft permit conditions. In most cases, the legal basis for a permit condition is included in the permit by citing the applicable regulation. In addition, the factual basis for the requirement may be the same as the legal basis. However, when the regulation is not specific and only provides general requirements, this review report is used to provide a more thorough explanation of the factual basis for the draft permit conditions.

PERMITTEE IDENTIFICATION

2. SFPP, L.P. owns and operates a refined petroleum products storage and distribution terminal located on Prairie Road in Eugene, Oregon.

FACILITY DESCRIPTION

3. The SFPP Eugene Terminal receives refined fuels from Portland via 8-inch pipeline. The fuels are temporarily stored in various tanks and then loaded into tanker trucks at one (1) of four (4) loading racks at the facility. Each rack has several loading positions that are capable of loading specific types and brands of refined petroleum product. One (1) additional rack, rack (5) is used for ethanol offloading. The material handled and dispensed by SFPP is not owned by SFPP. The material is owned by various petroleum companies (i.e., Texaco, Chevron) that pay SFPP to handle and store the refined petroleum product.

The maximum capacity of the facility is 288,000 gallons/hour and 2,522,880,000 gallons per year of refined petroleum product, and meets the definition of bulk gasoline terminal found in 40 CFR 60.501.

Pollutants emitted by the facility are volatile organic compounds (VOCs) from storage tanks, truck loading racks, piping fittings, and sample house drains.

EMISSIONS UNIT AND POLLUTION CONTROL DEVICE IDENTIFICATION

4. Emissions units identified in this permit are grouped primarily with respect to the common applicable requirements, and reflecting the associated (common) monitoring protocols. Emissions units in this permit are grouped as follow:

Emissions Unit (EU)	EU ID	Pollution Control Device (PCD) Description	PCD ID
Fixed roof storage tanks (ST)	FIXTANK	None	---
External floating roof ST	EXTANK	None	---
Internal floating roof ST	INTANK	None	---
Truck/trailer loading racks	TRACK	Vapor Recovery Unit	VRU
Fugitive VOC emissions	FGTVOC	None	---

5. FIXTANK (Fixed Roof Storage Tanks): This emissions unit represents all the fixed roof storage tanks existing at the permitted facility. This type of tank generally consists of a cylindrical steel shell with a permanently affixed roof, which may vary in design from cone (or domeshaped) to flat.

The SFPP facility houses a total of 12 fixed roof storage tanks, all of which have a capacity more than 39,000 gallons. All fixed roof storage tanks currently store volatile liquids with vapor pressures less than 0.022 psia. Fixed roof storage tank VOC emissions are the sum of breathing losses and working losses, which are a function of physical/chemical properties of materials being stored at stored condition, as well as the physical design of tank itself. This holds true for all types of storage tanks, including EXTANK and INTANK described below.

6. EXTANK (External Floating Roof Storage Tanks): This emissions unit represents all external floating roof storage tanks existing at the terminal. There are a total of 12 external floating roof tanks existing at the facility, with capacity ranging from 252,000 to 840,000 gallons. All EXTANK were installed on or before 1984. This type of tank generally consists of a cylindrical shell with an external floating roof that moves with respect to the stored liquid level.
7. INTANK (Internal Floating Roof Storage Tanks): This emissions unit represents all the internal floating roof storage tanks existing at the permitted facility. INTANK has both a permanent fixed cone roof and a floating deck inside, which is free to move vertically as the liquid level rises and falls, and either floats on the liquid surface or rests on pontoons several inches above the liquid surface. The facility has a total of 14 internal floating roof tanks. According to the permit application, there are three (3) internal floating roof tanks (17,18, and 19 listed in the permit EU ID section) constructed in 1973 that are subject to the NSPS requirements of 40 CFR Part 60, Subpart K. There are four (4) internal floating roof tanks (16, 40, 42, and 41) constructed or modified after the year 1984 that are subject to the NSPS requirements of 40 CFR Part 60, Subpart Kb. Tanks 16 and 25 were modified in 2007/2008 as part of the B07 construction project to increase ethanol offloading and became subject to the NSPS requirements of 40 CFR 60, Subpart Kb. The project involved adding a nozzle on both Tank 16 and 25 that increased the hourly potential to emit of VOC.
8. TRACK (Tanker Truck/Trailer Loading and Unloading Racks): This emissions unit represents the tank truck loading and unloading racks used to distribute various petroleum products. There are a total of four (4) loading racks at the facility with multiple fill positions at each rack. Rack four (4) was constructed in 1984, after the NSPS trigger date along with the vapor recovery unit. There is one (1) unloading rack used to offload ethanol from trucks; rack five (5) was constructed in 2008 to increase ethanol capacity. The affected facility for applicability of NSPS requirements of 40 CFR Part 60, Subpart XX is the total of all loading racks. An analysis of whether reconstruction or modification occurred was not presented. However, for ease of compliance, the facility has chosen to assume that all the loading racks in TRACK are subject to the Subpart XX requirements. With the exception of Rack 5, the displaced VOC vapors from TRACK are collected and routed to the vapor recovery unit (VRU). Rack 5 is for product unloading only and is therefore not subject to the Subpart XX requirements for loading racks. Loading rack number 2 has red-dye injectors for diesel fuel.
 - 8.a. Vapor Recovery Unit (VRU): This is a refrigeration type vapor recovery unit that controls fuel vapors from the loading racks. The VRU is an Edwards Engineering, Inc model, rated at 93.5% recovery efficiency. The VRU is designed to process a gasoline pumping rate of 2400 gpm at 35 mg of hydrocarbon per liter. The gases from the loading rack hoses are captured and piped to the VRU. Vapors go to one of two refrigeration units and enter a pre-cooler, cooling vapors between 25 and 50 degrees Fahrenheit. Condensed vapors drain into a decanter while remaining vapors continue to a two-section compartment of the refrigeration unit. The first section cools the condensed vapors to between 0 and -40° F and the second section to between -80 and -90° F. Condensed vapors also drain to the decanter and are pumped back to storage. One of the two refrigeration units defrosts several times per day by heating D-Limonene and pumping it through the refrigeration coils to melt any ice buildup.

9. FGTVOC (Fugitive VOC emitting sources): The emissions unit FGTVOG represents fugitive VOC emissions associated with VOC product handling. The pipe transport systems contain numerous valves, flanges, pumps, sampling ports, and other components through which VOC vapors escape. For the purpose of estimating VOC emissions, emissions factors published in EPA's Protocol for Equipment Leak Emissions Estimates (11/95), are used. Unless actual emission factors are available for use in the VOC emission calculations, the emission factors as listed in the Title V permit monitoring section should be used. The table below lists the number of each component currently existing at the permitted facility:

Component "i"	Number of Component "i"
Fittings (connectors and flanges)	356
Other (compressors and others)	236
Pumps	94
Valves	1,103

10. Categorically insignificant activities include the following:

- Evaporative and tail pipe emissions from on-site motor vehicle operation
- Distillate oil, kerosene, and gasoline fuel burning equipment rated at less than or equal to 0.4 million Btu/hr
- Natural gas and propane burning equipment rated at less than or equal to 2.0 million Btu/hr
- Office activities
- Janitorial activities
- Instrument calibration
- Maintenance and repair shop
- Air cooling or ventilating equipment not designed to remove air contaminants generated by or released from associated equipment
- Refrigeration systems with less than 50 pounds of charge of ozone depleting substances regulated under Title VI, including pressure tanks used in refrigeration systems but excluding any combustion equipment associated with such systems
- Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including associated vacuum producing devices but excluding research and development facilities
- Temporary construction activities
- Air vents from air compressors
- Fire brigade training
- Process raw water filtration systems
- Routine maintenance, repair, and replacement such as anticipated activities most often associated with and performed during regularly scheduled equipment outages to maintain a plant and its equipment in good operating condition, including but not limited to steam cleaning, abrasive use, and woodworking
- Electric motors
- Storage tanks, reservoirs, transfer and lubricating equipment used for ASTM grade distillate or residual fuels, lubricants, and hydraulic fluids
- On-site storage tanks not subject to any New Source Performance Standards (NSPS), including underground storage tanks (UST), storing gasoline or diesel used exclusively for fueling of the facility's fleet of vehicles
- Storm water settling basins
- Fire suppression and training
- Paved roads and paved parking lots within an urban growth boundary
- Health, safety, and emergency response activities
- Oil/water separators in effluent treatment systems

11. Aggregate insignificant emissions from activities identified by the permittee are detailed in the following table:

Emission Source	VOC (tons/year)
Prover	0.07005
Additive Tanks	0.02784
Ethanol Offloading	0.0097
Total	0.11

EMISSION LIMITS AND STANDARDS, TESTING, MONITORING, AND RECORDKEEPING

Rescinded ACDP Conditions

12. The facility has requested the following ACDP 20-7506 conditions do not appear in the Oregon Title V operating permit. The request has been granted because of reasons given below:
- 12.a. The Condition 1 of the existing ACDP 20-7506 Performance Standards and Emission Levels has been rescinded because there is a new PSEL established for the Title V permit. The original PSEL was based on 1984 tank emissions (61 tons of VOCs). This did not include the uncontrolled splash loading that occurred during 1984, which would have resulted in a PSEL of 1817 tons VOC per year. The Title V limit (415 tons per year of VOC) is based on the facilities potential emissions as well as current tank and pump configurations.
13. The facility has requested the following ACDP 20-7506 conditions to be revised in the Oregon Title V operating permit. The changes have been granted because of reasons given below:
- 13.a. Conditions 2 and 3 of the existing ACDP 20-7506 Performance Standards and Emission Levels have been revised. The Title V permit provides more clear and extensive rule applicability for the NSPS Subpart K, Kb and XX that the existing ACDP conditions were based upon.
- 13.b. The conditions from "Other Conditions", "Monitoring and Reporting", "Emission Reduction Plan", and "Fee Schedule" of the existing ACDP 20-7506 have been revised because the Title V permit format provides more clear and extensive rule applicability for these rules.

History of Physical Changes to the Facility

14. The following is a list of physical changes that have occurred at the facility.
- 14.a. Notice of Construction (NOC) 207506-B07: The facility applied for construction approval and minor permit modification to increase the ethanol blending as an oxygenate for gasoline. The construction involved adding ethanol availability to Loading Racks 1 and 2 and relocating ethanol offloading to new Loading Rack 5. INTANK No. 16 and EXTANK No. 25 became subject to the NSPS requirements of Subpart Kb as part of this construction project as the addition of a nozzle on each tank potentially allowed each tank to be emptied at a fast rate, thereby increasing hourly emissions and triggering the NSPS Subpart Kb requirements. The minor mod was rolled into the 2008 renewal.
- 14.b. NOC 207506-A07: The facility applied for construction approval for the installation of injectors on loading rack number two for red-dye injection into diesel fuel.
- 14.c. NOC 207506-A94: The facility completed the installation of secondary seals on 12 external floating roof tanks (tanks 21, 22, 23, 24, 26, 27, 29, 30, 31, 32, 33, and 34) in July of 1994.

- 14.d. An administrative change to the facilities ACDP occurred in February of 1992. Two existing additive storage tanks were replaced with a single new additive storage tank. The true vapor pressure of the liquid (0.08 psia) in the storage tank was low enough so as not to make the tank applicable to any NSPS requirement (see letter in file from LRAPA dated March 9, 1992).
- 14.e. NOC 20-7468-2517: The facility was granted approval to construct a refrigeration-based hydrocarbon vapor recovery system by the Oregon Department of Environmental Quality in November of 1986.
- 14.f. NOC 207506-A84: The facility was granted approval to construct three (3) petroleum tanks (tanks 40, 41, and 42) and one (1) loading rack in September of 1984.
- 14.g. The facility regularly replaces seals on existing tanks so as to reduce emissions and minimize loss of product. Dates of replacements of seals are not listed in this review report. The replacement of seals typically does not make the tank subject to NSPS requirements. The facility is required to notify LRAPA of any modifications to any tanks that would make the tanks subject to any NSPS requirements.
- 14.h. The facility voluntarily took external floating roof tanks (EXTANK) 21, 27, 33 and 34 out of service in 2002.

PLANT SITE EMISSION LIMITS (PSEL) INFORMATION

BASELINE EMISSION RATES

- 15. Baseline Operating Schedule: Continuous operation (8,760 hrs/yr).
- 16. Baseline emissions rates (BERs) are based on 1984 actual emissions for the facility. Emissions from 1977-78 were reportedly unavailable. At the time of the permit application submittal of 2000, SFPP reportedly defended its use of 1984 data by stating that emissions had decreased from the 1977-78 period. Emission reduction projects implemented in that time period were tank and tank seal improvements, and elimination of top-loading of tanker trucks. Uncontrolled splash loading of gasoline, a major contributor to emissions, continued through the end of 1984. In 1984, the applicant installed a vapor collection system (VCS) in accordance with the New Source Performance Standards (NSPS) of Title 40 CFR Part 60 Subpart XX (§60.502). This significant emission reduction is required by rule and must be discounted from the netting VOC BER (i.e. it cannot be used for credits or internal offsets). The netting BER for VOC for this facility was reset to present emission levels to account for the VRU. The calculations use TANKS 3.1 methodology to estimate emissions from the storage tanks. Estimated loading emissions prior to installation of the VCS are 1778 tons per year. The total throughput in 1984 was 368,299,974 gallons per year.
- 17. Baseline Changes: The facility requested a change in the baseline emissions to reflect better information with the renewal application received in 2005. The previous baseline emissions estimations did not account for fugitive emissions at the loading racks. The addition of the rack fugitives, which had been present in the baseline year but not accounted for, changed the total baseline emission rate for VOC from 418.6 to 480 tons per year. Unassigned Emissions in the amount of 1.6 tons/year are based on voluntary "out-of-service" commitment for emission units EXTANKS 21, 27, 33, and 34.
- 18. Other Baseline Changes: PM and PM10 from paved roads (Emission Unit FGTPM) was also removed from the baseline emission rate and PSEL as part of the 2007 renewal because fugitive particulate matter from paved roads is specifically identified as a categorically insignificant activity (CIA) in the Oregon Title V rules.

19. Baseline Emission Rates (tons/year):

Emissions Source	VOC
Loading	424.2
Tanks	51.3
Fugitive Emissions	0.94
Unassigned Emissions	1.6
TOTAL	480

PLANT SITE EMISSION LIMITS (PSELs)

- 20. The plant can be operated as much as 24 hours per day, 7 days per week, and 52 weeks per year.
- 21. The current PSELs are based on a maximum design throughput for the loading racks (TRACK) and use TANKS 4.0 methodology for calculating emissions from storage tanks (see Review Report Attachment).
- 22. Plant Site Emission Limits are summarized in the following table:

Pollutant	PSEL (ton/yr)	Unassigned Emissions (tons/yr)
PM	--	Not Evaluated
PM ₁₀	--	Not Evaluated
CO	--	Not Evaluated
NO _x	--	Not Evaluated
SO ₂	--	Not Evaluated
VOC	478	1.6
Total HAPs	24	NA

SIGNIFICANT EMISSION RATE

- 23. The Plant Site Emission Limit increase over the baseline emissions is less than the Significant Emission Rate (SER) as defined in LRAPA Title 38 rules for all of the pollutants as shown below.

Pollutant	Baseline Emissions (tons/year)	Proposed PSEL (tons/year)	Increase from Baseline (tons/year)	SER (tons/year)

PM	0	0	0	25
PM ₁₀	0	0	0	15
CO	0	0	0	100
NO _x	0	0	0	40
VOC	480	478	-1.6	40
SO _x	0	0	0	40
Pb	0	0	0	0.6

HAZARDOUS AIR POLLUTANTS

24. Estimated HAP emissions from the source are shown in the following table. These emissions are calculated on the basis of proposed operation parameters and must be recalculated by the permittee if production increases.

Hazardous Air Pollutants	Potential Emissions (tons/yr)
Hexane	7.5
Benzene	4.2
Toluene	6.0
2,2,4-Trimethylpentane	3.7
Xylene	2.3
Ethyl Benzene	0.5
Polycyclic Organic Material	0.2
Total	24.4

The above table shows that the source emits less than 10 tons per year of any single HAP and less than 25 tons per year of combined HAPs, and is therefore not a major source for HAPs. There are no NESHAPs that are applicable to this facility. However, the renewal application submitted by the facility on April 15, 2005 indicated potential total HAP emissions at 24.7 tons/year due to some conservative estimates surrounding tank service product type. The facility had decided to request changes to the permit to allow gasoline service in tanks that were previously of lower HAP emitting type (diesel, kerosene, ethanol). LRAPA informed the facility that under significant digit policy, 24.7 rounds to 25 tons/year total HAPs and would therefore make the facility a major source for HAPs. The facility then recalculated HAP emissions by limiting gasoline loaded on the loading racks to 51,633,462 barrels per year (from 60,068,571 barrels per year). The above total potential to emit for HAPs is based upon the limitation that total gasoline loaded will be limited to 51,633,462 barrels per year. Because the total HAP potential to emit from the facility had previously been estimated and essentially limited by the permit (through tank product service type specification) to be 21.1 tons/year, the facility is not subject to the requirements for 40 CFR 63 Subpart R-National Emission Standards for Gasoline Distribution Facilities. The facility is considered an "existing" area source subject to the requirements contained in 40 CFR 63 Subpart BBBBBB- National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. As an existing source, the facility is required to be in compliance with Subpart BBBBBB by January 10, 2011 however it is expected that the facility will be in compliance with Subpart BBBBBB by way of complying with the Subpart XX and Kb NSPS requirements.

MONITORING REQUIREMENTS

Title 40 CFR §70.6(a)(3)(i) requires that all monitoring and analysis procedures or test methods required under applicable requirements be contained in Title V permits. In addition, where the applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit.

The requirement to include in a permit testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance does not require the permit to impose the same level of rigor with respect to all emissions units and applicable requirement situations. It does not require extensive testing or monitoring to assure compliance with the applicable requirements for emissions units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. Where compliance with the underlying applicable requirement for an insignificant emission unit is not threatened by a lack of a regular program of monitoring and where periodic testing or monitoring is not otherwise required by the applicable requirement, then in this instance, the status quo (i.e., no monitoring) will meet §70.6(a)(3)(i). For this reason, the permit does not include any monitoring for insignificant emission units and activities.

The permit monitoring section divides the monitoring requirements into three categories; monitoring related to the facility-wide applicable requirements, the emissions-unit-specific monitoring, and lastly the compliance monitoring with respect to the PSELS. No monitoring is specified for insignificant activities.

Facility-wide monitoring:

25. The facility-wide monitoring associated with the bulk gasolineterminal operations include recordkeeping and/or sample analysis necessary to determine the sulfur content of residual and distillate oil sold or distributed to outside sources. Other facility-wide monitoring requirements include fugitive PM visual monitoring, and complaint investigation as needed.

Emissions unit specific monitoring:

26. The emissions unit specific monitoring section contains six unique monitoring conditions applicable to emissions unit TRACK, EXTANK, INTANK, FIXTANK, FGTVOG, and FGTPM:
 - 26.a. TRACK: Monitoring related to the tanker truck and trailer loading racks are specified in the NSPS Subpart XX by reference. The monitoring includes extensive recordkeeping requirements to ensure the gasoline delivery vessels being loaded at the terminal are tested and certified according to testing protocols of the NSPS. The periodic inspections are necessary to ensure no vapor or liquid leaks exist during product transfer, and the Vapor Recovery Unit (VRU) system is operating according to its design specifications. There is also an annual testing requirement to verify the VRU system's control efficiency. Compliance Assurance Monitoring (CAM) is has also been included with this renewal as required by 40 CFR Part 64. CAM for the VRU is the monitoring and continuous recording of the temperature of the refrigeration coils in the VRU. Based upon facility operator knowledge and testing of the system, both the north and south VRU are asserted by the facility to be in compliance at -68 degrees F. The facility has therefore proposed a maximum operating temperature, averaged over the emission control cycle, of -68 degrees F.
 - 26.b. EXTANK: The facility is required to implement and maintain a schedule for monitoring the tanks and equipment in EXTANK.
 - 26.c. INTANK: Monitoring related to internal floating roof tanks basically include periodic visual inspections to ensure there are no tears and deterioration of tank's covers and seals. The INTANK No.'s 17,18, and 19 are subject to the NSPS Subpart K monitoring, as referenced in the permit.

The INTANK No.'s 16, 25, 40 and 42 (and 41 when operating with gasoline) are subject to the NSPS Subpart Kb monitoring, as referenced in the permit.

- 26.d. FIXTANK: The facility is required to implement and maintain a schedule for monitoring the tanks and equipment in FIXTANK.
- 26.e. FGTVOC: Monitoring related to fugitive VOC sources includes periodic sight, sound, and smell inspections of the facility.

PSEL monitoring:

27. FIXTANK, INTANK, EXTANK

The EPA program Tanks 3.1 was used to estimate the VOC emission losses from the storage tanks. The program estimates emissions as either working losses or standing losses. Working losses are losses from the throughput of the fuel, which are directly tied to the maximum rate of the loading rack pumps.

Standing losses are associated with the static characteristics of the tanks such as roof type and tank volume. These emission estimates will remain unchanged throughout the life of the permit, unless the tanks are modified. When tanks are modified, the facility always upgrades the seals and/or roof type, which improve the tank and reduce losses of product.

The emission estimates thus represent the maximum potential to emit for the facility, and compliance with the PSELs is ensured and no further monitoring is required. If improved emission factors become available the PSELs will be recalculated at the time the permit is renewed.

28. TRACK

The VOC emissions from emission unit TRACK are based upon the maximum design rate for the loading rack pumps operating 8,760 hours per year. This is the potential to emit for the emission unit and therefore no PSEL monitoring for the unit is required. The facility is required to track 12-month rolling barrels per year of gasoline loaded to determine compliance with the synthetic minor limitations for total HAPs.

29. FGTVOC

The emissions from emission unit FGTVOC are based upon the maximum design rate for the loading rack pumps operating 8,760 hours per year and the fixed number of flanges, valves, etc., that currently exist at the facility. This is the potential to emit for the emission unit and therefore no PSEL monitoring for the unit is required.

RECORDKEEPING REQUIREMENTS

- 30. Recordkeeping requirements in this permit are drafted pursuant to OAR 340-218-0050(3)(b). The records of all monitoring specified in the Oregon Title-V Operating Permit 20-7506 must be kept at the plant site for at least 5 years. All records necessary to determine compliance with any permit conditions shall be made available to the LRAPA/EPA inspectors upon request.

REPORTING REQUIREMENTS

31. Reporting requirements in this permit are drafted pursuant to OAR 340-218-0050(3)(c). In addition to the monthly reports, the permittee is required to submit reports to LRAPA twice per year. The semi-annual reports are for certifying compliance with the permit requirements. The annual report consists of the second semi-annual compliance certification; in addition to the product throughputs, fuel usage, and other relevant data needed to determine compliance with the annual PSEL.

GENERAL BACKGROUND INFORMATION

32. The proposed permit is a replacement of the Air Contaminant Discharge Permit (ACDP 207506) which was issued on 07/01/84. The ACDP was originally scheduled to expire on 06/30/94.
33. This source is located in an area that is in attainment for all criteria pollutants except PM₁₀.
34. The following federal and /or LRAPA enforceable rules, that have specific limits and standards, have been determined to be applicable to this facility:
- 34.a. LRAPA rules: 32-010, 32-055, 38-010, 48-015(2), 50-020, and 51-015.
- 34.b. The facility is subject to the federal New Source Performance Standards (NSPS) in 40 CFR Part 60 Subparts K, Kb, and XX (see LRAPA 46-535).
- 34.c. The facility is not subject to the Process Weight Rule because all of the emissions of PM are fugitives and considered a categorically insignificant activity (CIA)

STRATOSPHERIC OZONE DEPLETING REQUIREMENTS

35. The permittee does not use any of the class I or class II ozone depleting chemicals at the plant site, and therefore they are not subject to meet the requirements of 40 CFR Part 82, Subpart E; The Labeling of Products Using Ozone-depleting Products. The permittee does not perform service on motor (fleet) vehicles that involves the refrigerant in the motor vehicle air conditioner (MVAC), and therefore the requirements of 40 CFR Part 82, Subpart B; Servicing of Motor Vehicle Air Conditioners, do not apply.

COMPLIANCE HISTORY

36. The following is the compliance history at the facility:
- 36.a. The facility received Notice of Non-compliance (NON) No. 1028 for exceeding the throughput limit of 8.7 million barrels/year as stated in ACDP #207506. In 1993 the facility reported the yearly throughput at 12 million barrels which violated the condition in the ACDP. The facility responded with EPA emission factors which showed VOC emissions less than the PSEL. LRAPA accepted the SFPP's response and informed SFPP that the NON was closed.
- 36.b. On April 19, 2002, the facility received NON No. 2405 for failure to submit annual reports on or before February 15 as required by Condition 44.b in the Title V permit. The annual report was received on May 20, 2002 and the file was closed.
- 36.c. On December 27, 2002, the facility received Notice of Civil Penalty (NCP) No. 02-2448 for failure to failure to perform reasonable inquiry required of all Title V Compliance Certifications,

for violation of permit Condition 44 by failure to submit the second semi-annual compliance certification and annual report by February 15 and for failure to submit an application for permit modification for changes in PSEL calculation methodology. A total civil penalty was assessed by LRAPA for the violations in the amount of \$7,500. On January 13, 2003, the facility submitted a check in the amount of \$7,500 and the file was closed.

SOURCE TEST RESULTS

37. LRAPA has documented the following comprehensive history of testing conducted at the SFPP. As indicated in the periodic monitoring and recordkeeping section of this review report, the permit includes extensive periodic monitoring requirements for each applicable requirement condition. These monitoring requirements include periodic source testing, parameter monitoring, and recordkeeping. The information obtained from the monitoring can be used by the permittee to periodically certify compliance with the emissions limits and standards. LRAPA may agree to the reduction of the testing frequency if testing shows reasonable consistency with the emission factors used to estimate emissions. However, LRAPA may request additional testing or conduct their own testing to independently determine compliance with the emission limits and standards.

38. Source Test Information (CT = COMPLIANCE TEST, THC = Total Hydrocarbons)

Table 41: Summary of Source Test Information			
Emission Device	Test Date(s)	Throughput Rate During the Test	Results
Edwards Refrigeration Vapor Recovery System	October 15, 1986 CT	217,133 gallons of gasoline and, 14,895 gallons of diesel	0.14 lb/1000 gallons
Edwards Refrigeration Vapor Recovery System	April 26, 1995	591,002 gallons of gasoline	0.15 lb Total Hydrocarbon (THC)/1000 gallons
Edwards Refrigeration Vapor Recovery System	May 9, 1996	564,343 gallons of gasoline	0.158 lb Non-methane and ethane hydrocarbons /1000 gallons
Edwards Refrigeration Vapor Recovery System	March 5, 1997	486,221 gallons of gasoline	0.21 lb THC/1000 gallons
Edwards Refrigeration Vapor Recovery System	June 9, 1999	695,195 gallons of gasoline	0.144 lb THC/1000gallons
Edwards Refrigeration Vapor Recovery System	April 12, 2002	673,329 gallons of gasoline	0.109 lb THC/1000 gallons
Edwards Refrigeration Vapor Recovery System	April 15, 2003	681,820 gallons of gasoline	0.189 lb THC/1000 gallons
Edwards Refrigeration Vapor Recovery System	August 10, 2004	672,507 gallons of gasoline	0.105 lb THC/1000 gallons
Edwards Refrigeration Vapor Recovery System	April 12, 2005	675,319 gallons of gasoline	0.15 lb THC/1000 gallons
Edwards Refrigeration Vapor Recovery System	October 25, 2005 (Engineering Test at minus 120F)	51,909 gallons of gasoline	0.18 lb THC/1000 gallons
Edwards Refrigeration Vapor Recovery System	October 25, 2005 (Engineering Test at – minus 105F)	49,173 gallons of gasoline	0.29 lb THC/1000 gallons of gasoline

Table 41: Summary of Source Test Information			
Emission Device	Test Date(s)	Throughput Rate During the Test	Results
Edwards Refrigeration Vapor Recovery System	April 14, 2006	603,034 gallons of gasoline	0.16 lb THC/1000 gallons of gasoline
Edwards Refrigeration Vapor Recovery System	April 13, 2007	600,248 gallons of gasoline	0.125 lb THC/1000 gallons of gasoline
Edwards Refrigeration Vapor Recovery System	April 15, 2008	551,073 gallons of gasoline	0.121 lb THC/1000 gallons of gasoline

PUBLIC NOTICE

39. This permit was on public notice from June 18, 2008 to July 17, 2008. One comment was submitted in writing during the comment period. LRAPA will review the comments and modify the permit as may be appropriate. LRAPA will hold a public hearing if requested by 10 or more individuals or one person representing a group of 10 or more individuals. No hearing was requested. A proposed permit will then be sent to EPA for a 45 day review period. LRAPA may request and EPA may agree to an expedited review of 5 days if there were no substantive or adverse comments during the comment period. In any event, the public will have 105 days (45 day EPA review period plus 60 days) from the date the proposed permit is sent to EPA to appeal the permit with EPA. The permit will be issued following EPA's review.

EMISSIONS DETAIL SHEETS

40. The emissions detail sheets are attached to Review Report.

EPA REVIEW

41. The proposed permit renewal was sent to EPA on September 24, 2008, for a 45-day review period. LRAPA requested and EPA agreed to an expedited review because no comments requiring change to the permit were received from the public and no substantive changes to the permit were made. The public has 105 days (45-days EPA review period plus 60 days) from the date the proposed permit was sent to EPA to appeal the permit with EPA.

MAX/cmw
 10/01/08

July 29, 2008

RE SEPP, LP.
Title V Operating Permit
(Number 207506)

Because Eugene already has an air quality
problem, I suggest we institute a NO TRADE
policy on industrial emissions.
Give us a public hearing.

Aldine O. Rubenstein

Aldine Rubinstein
2555 Jackson Street
Eugene, Oregon 97405

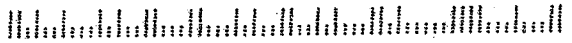
EUGENE OR 974

30 JUL 2008 PM 2 L



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JUL 31 2008
53150
LANE REGIONAL AIR
PROTECTION AGENCY

L RAPA Permit Coordinator
1010 Main St
Springfield OR 97477



Eugene Terminal
Loading Emissions Gasoline

Loading emission were determined using the following equation taken from AP-42, Section 5.2.

$$L = 12.46SPM/T(1-EFF)$$

where::

L = loading loss, lb/1000 gallons
S = saturation factor
P = true vapor pressure, psia
M = molecular weight, lb/lbmole
T = temperature, degree R
EFF = overall reduction efficiency %

S = 1
P = 4.567 psia
M = 66 lb/lbmole
T = 513.3 degree R
EFF = 98.7 %

L = 0.095 lb/1000 gallon

L_{VRU} = 0.29 lb/1000 gallons

L total 0.385 lb/1000 gallons

Volume = 2,168,605 1000 gallons
Volume = 51,633,462 barrels

Total Losses (VOC)

834,913 lbs/yr
417.5 tons/yr

Loading Emissions Kerosene

L = 0.00061 lb/gallon

L_{VRU} = 0.00301 lb/1000 gallons

L total 0.00362 lb/1000 gallons

Volume = 354,275 1000 gallons
Volume = 8,435,109 barrels

Total Losses (VOC)

1,282 lbs/yr
0.6 tons/yr

Eugene Terminal Facility HAP Calculations

Type of gasoline: HAP	Normal	Kerosene (diesel)													
	Hexane	Benzene	Toluene	2,2,4-Trimethylpentane	Xylenes	Ethyl Benz	POM as 16-PAH	Cumene	Naphthalene	Total					
Hexane	1.6	9													
Benzene	0.9	0													
Toluene	1.3	0													
2,2,4-Trimethylpentane	0.8	0													
Xylenes	0.5	0													
Ethyl Benzene	0.1	0													
POM as 16-PAH	0.05	0													
Emission Unit	VOC	Hexane	Benzene	Toluene	2,2,4-Trimethylpentane	Xylenes	Ethyl Benz	POM as 16-PAH	Cumene	Naphthalene	Total				
Fixed Roof	2,221	200	0	0	0	0	0	0	0	0	200				
Internal Floating Roof	61,288	981	552	797	490	306	61	31	0	0	3,218				
External Floating Roof	19,770	316	178	257	158	99	20	10	0	0	1,038				
Subtotal, All Tanks	83,279	1,497	730	1,054	648	405	81	41	0	0	4,455				
Loading Racks and Vapor Recovery	834,913	13,359	7,514	10,854	6,679	4,175	835	417	0	0	43,833				
System - Gasoline Loading Racks and Vapor Recovery	1,282	115	0	0	0	0	0	0	0	0	115				
System - Kerosene Subtotal All Racks and VRU	836,196	13,474	7,514	10,854	6,679	4,175	835	417	0	0	43,948				
Fugitive Emissions From Valves and Fittings	1,889	30	17	25	15	9	2	1	0	0	99				
Wastewater Collection	5,580	89	50	73	45	28	6	3	0	0	293				
ALA Sources	56	0	0.51	0.12	0.075	1.8	0.10	0.0047	1.41	0.063	4				
Total (lb)	927,000	15,090	8,311	12,005	7,388	4,619	924	462	1	0	48,800				
Total (tons)	463.5	7.5	4.2	6.0	3.7	2.3	0.5	0.231	0.0	0.0	24.40				

VOC

PSEL Changes

VOC Plant Site Emission Limit (Data from LRAPA Title V Permits)				
Emission Source	2001 Permit		2002 Permit Modification	
	Emissions (TPY)	Comments	Emissions (TPY)	Comments
Tanks	52.2	Used TANKS 3.0.	48.0	Updated tank list. Used TANKS 3.0.
Loading Racks/VRU	365.8	VRU only. Did not account for rack fugitives.	365.8	VRU only. Did not account for rack fugitives.
Valve/fitting Fugitives	0.6	Old valve & fitting count.	0.6	Old valve & fitting count.
Wastewater Collection	0	Did not quantify.	0	Did not quantify.
Aggregate Insignificant Activities	0	Did not quantify.	0	Did not quantify.
Credits or Unassigned PSEL	0	Did not evaluate.	4.2	Due to reduction in tank emissions.
Total	418.6		418.6	

VOC Plant Site Emission Limit (Updated Source Information and TANKS Program)						
Emission Source	2001 Conditions - Adjusted with Better Data		2002 Conditions - Adjusted with Better Data		Requested PSEL for 2005 Renewal	
	Emissions (TPY)	Comments	Emissions (TPY)	Comments	Emissions (TPY)	Comments
Tanks	53.2	Same tank data as in 2001, except used TANKS 4.0.	48.9	Revised tank list (fewer tanks) using TANKS 4.0.	51.3	Updated tank list using TANKS 4.0. All tanks designated for diesel use were estimated using more conservative data for kerosene.
Loading Racks/VRU	424.2	Same VRU emissions as 2001, but added rack fugitives which had been present but not quantified.	424.2	Same VRU emissions as 2001, but added rack fugitives which had been present but not quantified.	424.2	Same VRU emissions as 2001, but added rack fugitives which had been present but not quantified.
Valve/fitting Fugitives	0.6	Same valve and fitting count as in 2001.	0.6	Same valve and fitting count as in 2001.	0.94	Updated valve and fitting count.
Wastewater Collection	1.89	Source was present in 2001 but not quantified	1.89	Source was present in 2001 but not quantified	1.89	Source was present in 2001 but not quantified
Aggregate Insignificant Activities (AIA)	0.1	Sources were present in 2001 but not quantified	0.1	Sources were present in 2001 but not quantified	0.1	AIA allowed up to one ton of VOC.
Credits or Unassigned PSEL	0.0		4.3	Due to reduction in tank emissions.	1.6	Due to reduction in tank emissions.
Total	480.0		480.0		480.0	