



NRO-261-10

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHERN REGIONAL OFFICE

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COMMONWEALTH OF VIRGINIA Department of Environmental Quality Northern Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Motiva Enterprises, LLC
Springfield Terminal
8206 Terminal Road
Lorton, Virginia
Permit Number VA-70234

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Motiva Enterprises, LLC, has applied for a Title V Operating Permit for its Springfield Terminal facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:


Gary Beeson (703) 583-3969

Date: August 26, 2010

Regional Air Permit Manager:


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Date: 09/01/10

Regional Director:


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Date: 9-01-10

FACILITY INFORMATION

Permittee

Motiva Enterprises, LLC
8206 Terminal Road
Lorton, Virginia 22709

Facility

Motiva Enterprises, LLC
Springfield Terminal
8206 Terminal Road
Lorton, Virginia 22709

County-Plant Identification Number: 51-059-00064

SOURCE DESCRIPTION

SIC Code: 5171 - Petroleum Bulk Storage and Terminal
NAICS: 424710 - Bulk Stations and Terminals – Wholesale

The Motiva Enterprises, LLC facility, formerly Shell Oil Company - Springfield Terminal, is a grandfathered petroleum liquids storage and distribution terminal. The original registration for the facility is dated June 26, 1972. Changes prior to 1989 did not trigger new source permit action.

The facility receives gasoline, ethanol, and distillates via shipments through common carrier pipeline. These products are stored in above ground tanks and dispensed through a four lane loading rack. All lanes are of the bottom loading type and can accommodate all fuel types. Gasoline, ethanol, and ethanol/gasoline blends are stored in internal floating roof (IFR) tanks. Distillates are stored in fixed-roof tanks, although they could be stored in tanks with IFR's. There are ten above ground storage tanks, seven with IFR's, and one that will be converted to an IFR.

The facility also has small capacity tanks comprised of seven product additive tanks, an interface tank, a diesel tank, and a petroleum contact water tank. Additive Tanks T16 and T18 have been added since the last Title V permit and are considered insignificant sources. Additives are received by truck, stored, and transferred to the loading rack where they are mixed with the appropriate fuel and dispensed during tanker truck loading. The ethanol is blended into gasoline at the loading rack, similar to current gasoline additives.

A vapor recovery unit (VRU) collects vapor associated with the tank truck loading racks. The (VRU) is comprised of dual carbon absorption beds. The collected vapor is condensed in the carbon beds and the product returned to the storage system. The carbon beds are operated on an alternating time schedule with one bed in operation cycle while the other bed is in the reactivation cycle. This alternating process repeats with one bed in the operation cycle while the other bed is in the reactivation cycle.

Tank trucks arriving at the rack have the vapor tightness certification verified and the tanker is then loaded. If the identification is not validated the driver must show evidence of the vapor tightness compliance for his tanker or the tanker will not be loaded. Two attempts by a driver to load an uncertified tanker will result in the driver being banned from service at the terminal.

The facility maintains a computerized delivery system which maintains a data base of the tanker trucks with a valid tightness test which has been conducted within the last twelve months. Any tanker truck attempting to load without a valid tightness test on record will not be allowed to fill until the documentation is submitted to the terminal operator and the information is verified and entered into the computerized delivery system. By the requirements to maintain and operate this computerized delivery system the filling of a non-tightness certified tankers provides a reasonable assurance that non-tight tankers will not be filled.

This source is located in a non-attainment area for ozone. The facility is a Title V major source of volatile organic compounds (VOC) and received a Title V permit on October 14, 1999. The Title V renewal application was received on April 14, 2004, allowing the facility to operate under a permit application shield. Upon request by the Department of Environmental Quality (DEQ) an update was received on August 14, 2009.

A minor NSR permit was issued on December 15, 1993, and amended on October 12, 1999, to allow the conversion of the fixed roof tank, T04, to an internal floating roof. Initially, the conversion was considered subject to NSPS Kb, but in subsequent discussions with EPA it was determined that the NSPS did not apply.

In December 2004, Motiva requested and received an exemption to install a 2,500 gallon tank to be used as an additive tank for a lubricity product. This lubricity product will be dispensed at the loading rack as any other additive would be dispensed and blended with the gasoline at that point.

In April 2005 the facility submitted a request to have the capability of storing ethanol in any of the seven tanks with internal floating roofs (tanks T01, T02, T04, T05, T06, T07, and T10) in addition to the currently approved storage of gasoline and distillates in these tanks. Upon review this activity it was determined that the storage of ethanol in the tanks would be exempt from permitting because there would be a reduction in emissions and even though this was a change in materials, the reduced emissions would make this exempt from permitting.

A permit was issued April 15, 2008, to convert an eighth tank, T03, to an IFR. On September 3, 2009, an eighteen month extension was granted for this conversion. As of this permit issuance date the tank has not been converted. Upon conversion the tank will be subject to NSPS 40 CFR 60, Subpart Kb.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was completed on October 23, 2007. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, were evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:
Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Working Capacity ¹	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date ²
T01	T01	Petroleum liquid storage tank. (Gasoline/Distillate/ Ethanol/Jet A/Ethanol-Gasoline Blend)	620,340 gal	Internal floating roof w/primary and secondary seals.	----	VOC	October 14, 1999
T02	T02	Petroleum liquid storage tank. (Gasoline/Distillate/ Ethanol/Jet A/Ethanol-Gasoline Blend)	2,528,400 gal	Internal floating roof in cone roof tank w/primary seal.	----	VOC	October 14, 1999
T03 ³	T03	Petroleum liquid storage tank. (Gasoline/Distillate/ Ethanol/Jet A/Ethanol-Gasoline Blend)	461,160 gal	Internal floating roof in cone roof tank w/ double shoe seals.	----	VOC	April 15, 2008
T04	T04	Petroleum liquid storage tank. (Gasoline/Distillate/ Ethanol/Jet A/Ethanol-Gasoline Blend)	1,223,460 gal	Internal floating roof w/primary and secondary seals.	----	VOC	April 15, 2008
T05	T05	Petroleum liquid storage tank. (Gasoline/Distillate/ Ethanol/Jet A/Ethanol-Gasoline Blend)	1,525,020 gal	Internal floating roof in cone roof tank w/primary seal.	----	VOC	October 14, 1999
T06	T06	Petroleum liquid storage tank. (Gasoline/Distillate/ Ethanol/Jet A/Ethanol-Gasoline Blend)	3,054,660 gal	Internal floating roof in cone roof tank w/primary seal.	----	VOC	October 14, 1999
T07	T07	Petroleum liquid storage tank. (Gasoline/Distillate/ Ethanol/Jet A/Ethanol-Gasoline Blend)	1,592,640 gal	Internal floating roof in cone roof tank w/primary seal.	----	VOC	October 14, 1999
T10	T10	Petroleum liquid storage tank. (Gasoline/Distillate/ Ethanol/Jet A/Ethanol-Gasoline Blend)	3,511,620 gal	Internal floating roof w/primary and secondary seals.	----	VOC	October 14, 1999
VRU	VRU	Four-lane Tanker Truck Loading Rack (Gasoline) ⁴	144,000 gal/hr 730,537,800 gal/yr	John Zink VRU, Model No. AA-825-5-15B Activated Carbon Adsorption Beds (2)	VRU	VOC	October 14, 1999

¹ The Size/Working capacity is provided for informational purposes only, and is not an applicable requirement.

² Emission units with applicable permit date of 10/14/99 are grandfathered. They are only listed in the original Title V permit issued 10/14/99.

³ Tank T03 must be equipped with an internal floating roof (IFR) prior to storing gasoline, ethanol, or gasoline-ethanol blend. As of the issuance date of this permit, the tank does not have IFR.

⁴ Gasoline is used in analysis as worst case fuel. Product throughput used: Gasoline - 730,537,800 gallons/yr.

EMISSIONS INVENTORY

A copy of the 2009 annual emission update and the 2009 emission inventory is attached (See Attachment 2 and Attachment 3, respectively). Emissions are summarized in the following tables.

Table 2: 2009 Actual Criteria Emissions from Annual Emission Update					
	2009 Criteria Pollutant Emission in Tons/Year				
Emission Unit	VOC	CO	SO ₂	PM ₁₀	NO _x
Standing/Withdrawal Loss-Gasoline	26.53				
Gas Tank Truck Bottom Load	10.16				
Jet Kerosene Breathing/Working	2.8				
Jet Tank Truck Bottom Load	0.03				
Fugitive Losses-Facility	1.11				
Interface-Bottom Loading	0.003				
Total	40.7				

Table 3: 2009 Facility HAP Emissions from Title V Renewal Application	
Pollutant	2009 Hazardous Air Pollutant Emission in Tons/Yr
2,2,4-Trimethylpentane	0.216
Benzene	0.107
Cumene	0.0306
Ethylbenzene	0.039
n-Hexane	0.216
MTBE	0.12
Toluene	0.205
Xylene(s)	0.148
TOTAL	1.08

EMISSION UNIT APPLICABLE REQUIREMENTS

Motiva - Springfield terminal is a grandfathered facility subject to the Virginia existing source regulation, 9 VAC 5 Chapter 40, Article 37, with the exception of the conversion of two fixed roof tanks, T03 and T04 to internal floating roof (IFR) tanks, which are subject to the new source review (NSR) regulation, 9 VAC 5 Chapter 80, Article 6. Tank T03, upon conversion completion, is subject to New Source Performance Standard (NSPS) 40 CFR 60 Subpart Kb (Sections 60.110b – 60.117b), which applies to storage vessels with a capacity greater than 20,000 gallons modified after July 23, 1984.

In the original Title V permit the replacement of the vapor recovery unit (VRU) in 1986 was determined to be subject to NSPS 40 CFR 60, Subpart XX – Standards of Performance for Bulk Gasoline Terminals. Subpart XX applies to the construction or modification of affected facilities commenced after December 17, 1980. An affected facility is the total of all the loading racks at a bulk gasoline terminal, and means the loading arms, pumps, meters, shutoff valves, relief valves, and other piping and valves necessary to fill delivery tank trucks. Since the VRU is not an affected facility, the NSPS applicability was rescinded and the facility is not subject to NSPS Subpart XX. However, as provided in the renewal application by the facility, the requirements of Subpart XX that were included in the original Title V permit will be maintained, but the citations will reference 9 VAC 5 Chapter 80 Article 1.

In addition, the original Title V permit cited existing source regulations (Chapter 40, Article 37) applicable to bulk gasoline plants – facilities with a daily average throughput less than 20,000 gallons. Motiva Springfield terminal meets the definition of a bulk gasoline terminal – total average daily gasoline throughput greater than 20,000 gallons. Based on Motiva's annual gasoline throughput of 730,537,800 gallons, the average daily throughput for the facility exceeds two million gallons; therefore, the conditions and citations are revised to reflect a bulk gasoline terminal. Since the facility is subject to the more restrictive emission standards based on the NSPS Subpart XX, the revisions will not jeopardize compliance for the facility.

Condition III. Equipment Specific Requirements

Vertical Fixed Cone Roof Tanks with internal floating roofs (IFR)

A. Limitations

1. Emission Control: Tank: T01, T02, T04, T05, T06, T07, and T10

These tanks are grandfathered and are subject to the existing source rule 9 VAC 5 Chapter 40, Article 37 (Sections 5200 through 5340). VOC emissions from the gasoline/distillate petroleum storage tanks shall be controlled by IFR's with appropriate seals. The petroleum storage tanks shall be provided with adequate access for inspection. Tanks storing volatile organic compounds (VOC's) shall achieve a minimum 90% by weight reduction in VOC emissions. Storage of petroleum products with a true vapor pressure greater than or equal to 1.5 psia shall achieve this reduction by installing an IFR with a seal system as described in 9VAC5-40-5230.A.1. Tanks must be painted white, light pastel or light metallic. The coating must be in good condition.

2. Emission Control: Tank: T03

A permit was issued April 15, 2008, to convert tank T03 to an IFR. On September 3, 2009, an eighteen month extension was granted for this conversion. Upon conversion the tank will be subject to the NSPS, 40 CFR 60, Subpart Kb. A tank with a fixed roof in combination with an internal floating roof must meet certain specifications that mitigate VOC emission loss from sampling, from access to product by ladder or through any openings (e.g. rim space vents, automatic bleeder vents), and from filling, emptying, or refilling of the tank. Note: Slotted guidepoles are included as an opening that should have 'no visible gap' (Federal Register /Vol. 65, No. 72 /Thursday, April 13, 2000 /Notices 19891). Motiva Springfield terminal participates in the voluntary Emission Reductions Partnership Program for slotted guidepoles for NSPS Subpart Ka/Kb storage vessels. The slotted guidepoles emissions from Subpart Kb and non-Kb tanks are accounted for in the Tanks program provided with the 2004 TV renewal application. Once the IFR conversion is completed on tank T03, the Tanks program will include any resulting emissions.

3. Products Stored

In the NSR permit amendment application dated August 8, 2007, the facility requested that the products for storage in the IFR tanks be gasoline, ethanol, ethanol/gasoline blend, diesel fuel, and Jet A with the flexibility to run all products through every lane, arm, and riser. This is reflected in the NSR permit issued 4/15/08 for tank T03 and is included in the federal operating permit for all tanks. There is no increase in emissions resulting from the inclusion of this condition.

4. Requirements by Reference: Tank T03

Except where this permit is more restrictive than the applicable requirement, the NSPS equipment, T03, shall be operated in compliance with the requirements of 40 CFR Part 60 Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) and 40 CFR 60 Subpart A – General Provisions.

5. Permit Invalidation, T03 – The portion of this permit which pertains to the construction of the internal floating roof in tank, T03, shall become invalid if the project has not commenced by April 15, 2011, as stated in the approval request letter dated September 30, 2009, from the DEQ to Ms. Susan Horning (See Attachment 1). Motiva requested an extension due to unanticipated business delays, which did not warrant the conversion as initially planned.

B. Monitoring

1. Tank Visual Inspection: Initial Fill

Subpart Kb requires a visual inspection of a tank prior to filling with gasoline or ethanol. This applies to tank T03 only since all other IFR tanks are already filled.

2. Tank Annual Visual Inspections

This is a requirement of the existing source regulation and Subpart Kb (Tank T03); therefore, it applies to all tanks.

3. Tank Visual Inspection after Emptying or Degassing

This is a requirement of the existing source regulation and Subpart Kb (tank T03); therefore, it applies to all tanks.

C. Recordkeeping

Conditions III.C.1 through III.C.3 require records for all tank inspections, tank throughput information for all tanks, product information for tanks T03 and T04, and tank dimension and capacity for tank T03 per Subpart Kb. These records must be available on site for inspection by DEQ and current for most recent five years.

D. Reporting

1. Tank T03 is subject to the NSPS Subpart Kb. 40 CFR 60.115b (a)(1) requires an initial notification for the installation and start-up of the IFR in Tank T03.
2. All IFR tanks are required to have an annual inspection. Subpart Kb (40 CFR 60.115b (a) (3)) requires notification if defects are detected during the annual inspection. Since the Subpart applies only to tank T03, the condition is expanded to include all tanks. This will ensure that repairs are made in a timely manner. Existing sources are subject to 9 VAC 5-40-50 H which requires sources to provide reports at the request of the Board.
3. The permittee is required to notify the DEQ at least thirty days prior to the filling or refilling of each IFR storage tank which requires an inspection. This condition applies to all IFR tanks. Upon conversion to an IFR, Tank T03 is subject to NSPS Subpart Kb and will be required to notify the DEQ.

Condition IV. Process Equipment Requirements
Loading Rack, VRU, and Tanker Truck Vapor Tightness

A. Limitations

1. Emission Control: Loading Rack -

The facility is subject to the existing source regulation 9 VAC 5-40-5230 C, which requires a vapor collection and control system meeting criteria (see a. – d. below) that will ensure compliance with the permitted emission standard.

Note: The original Title V permit required a control efficiency of 77% per regulation 9 VAC5-40-5220 D which is relevant to bulk gasoline plants. The applicable, and more restrictive, regulation for bulk gasoline terminals is 9 VAC 5-40-5220 C.

- a. The vapor collection system shall be designed to prevent any total organic compound vapors collected at one loading rack from passing to another rack. Displaced vapor and air from each loading rack shall be vented only through the VRU, and liquid drainage from the loading device shall be minimized.
 - b. Pressure relief valves on storage containers and tank trucks should be set to release at no less than 0.7 PSI or the highest possible pressure, in accordance with the following National Fire Prevention Association Standards: "Standard for Tank Vehicles for Flammable and Combustible Liquids"; "Flammable and Combustible Liquids Code"; "Code for Motor Fuel Dispensing Facilities and Repair Garages" (See 9 VAC 5-20-21).
 - c. Pressure in the vapor collection lines should not exceed tanker truck pressure relief valve settings.
 - d. All loading and vapor lines should be equipped with fittings which make vapor tight connections and which close when disconnected.
2. Total Organic Compound (TOC) Emissions: VRU - The TOC emissions from the VRU shall not exceed 35 milligrams per liter (mg/l) of gasoline loaded.

The applicable existing source regulation, 9 VAC 5-40-5220 C, prohibits the discharge of VOC's in excess of 0.67 lbs per 1,000 gallons (80 mg/l) of gasoline loaded. This requirement is streamlined because the facility based emission estimates on the more restrictive emission rate of 35 mg of TOC / liter of gasoline loaded, established in Subpart XX, (40 CFR 60.502(b)). This emission rate was incorporated into the original Title V permit and is carried forward into the renewal.

3. Fugitive Emissions: Loading Rack - The VOC fugitive emissions from the loading rack shall be determined by throughputs and the established factor of 8 mg/l of gasoline loaded as reflected in EPA 450/2-78-051. These emissions are required to be calculated annually for emission inventory and fee purposes.

In accordance with 9 VAC 5-80-110.A.3, the permit content shall include applicable requirements that apply to fugitive emissions. Major sources are required to pay an annual permit program fee based on actual emissions, which includes fugitives. The emission rate used to determine fugitive emissions is derived from the Controls Techniques Guidelines (CTG).

4. Tanker Truck Vapor Tightness Certification -

Tank trucks loaded or unloaded at the facility must be designed, maintained and certified to be vapor tight as required by Condition IV.A.4.a-i. Although not subject to NSPS Subpart XX, this condition reflects the requirements of Subpart XX: 40 CFR 60.502(e)(3)-(5) and 40 CFR 60.502(f)-(i). These were incorporated into the original Title V permit and carried forward into this renewal. This condition is more restrictive than the requirements of the streamlined existing source regulation, 9 VAC 5-40-5220 G.

B. Monitoring

1. Monthly Leak Inspections

The facility is required to verify vapor tightness of the vapor collection system, the vapor processing system and each loading rack by monthly inspections during the loading of tanker trucks. Sight, sound, and smell are acceptable means for the determinations. Findings must be recorded in a log book and repairs must be made within fifteen calendar days.

The foundation for this requirement is the existing source regulation 9 VAC 5-40-5220 G.7, but, the condition reflects NSPS Subpart XX, 40 CFR 60.502 (j), which is more restrictive. The existing source regulation is streamlined.

2. Monitoring Device: VRU –Volatile organic compound and total organic compound emissions through the vapor recovery unit (VRU) must be monitored by either a flame ionization detector (FID), a photo-ionization detector (PID), or a Non-Dispersive Infrared Analyzer (NDIR) or other method as approved by the DEQ. The control equipment sensor shall be located in the outlet duct or stack, and the frequency of testing shall be hourly, testing may be performed manually, or it may be continuous on a chart or by data acquisition. The sensor shall measure total organic compounds (TOC) rather than individual organic compounds. This equipment shall be operated according to the manufacturers instructions.

The requirement to monitor TOC stems from the emission standard prescribed by NSPS Subpart XX: 35 milligrams of total organic compounds per liter of gasoline loaded.

3. The monitoring device shall be certified for accuracy annually at a minimum. The methods shall be approved in advance by the Region Air Compliance Manager of the DEQ's NRO.
(9 VAC 5-80-110 E)

C. Recordkeeping

Conditions IV.C.1 through 7 require maintenance of records of emission data and operating parameters necessary to demonstrate compliance with the permit. These include tanker truck vapor tightness documentation, pressure readings from the vapor collection system and liquid loading equipment, all leak check inspections, monitoring records of the VRU emissions and supporting documentation, temperature of the carbon beds and vacuum at the VRU inlet, records of replacements or additions to the VRU, and results of all performance tests.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years.

D. Testing

When required, the VRU shall be stack tested to demonstrate that the maximum TOC emissions through the unit do not exceed 35 mg/l of gasoline loaded. Test methods and

procedures described in 40 CFR 60.503(a)-(c) and 40 CFR 60, Appendix A, shall be used, and include the following:

1. Method-27- Determination of Vapor Tightness of Gasoline Delivery Tanks Using Pressure-Vacuum Test
2. Method 25A and B- Determination of Total Gaseous Non-methane Organic Emissions as Carbon.
3. Method 21- Determination of Volatile Organic Compound Leaks
4. Method 18- Measurement of Gaseous Organic Compound Emissions by Gas Chromatography
5. Method 2A- Direct Measurement of Gas Volume through Pipes and Small Ducts

E. Reporting -

When a leak is detected in accordance with Condition IV.B.1 cannot be repaired within fifteen days, the permittee shall notify the Regional Air Compliance Manager of the DEQ's NRO. The notification shall state the circumstances of the leak and the reason repair cannot be made within the prescribed fifteen days. A schedule for the repair must accompany the notification.

Condition V. Facility Wide Conditions

Motiva has requested throughput limits and HAP limits under 9 VAC 5-80-100 B. 2 to make it clear that it does not have the potential to emit at the major source level for HAP's. Motiva is not taking the limits to change its status from major to minor to avoid 40 CFR 63 Subpart R-National Emission Standards for Gasoline Distribution Facilities.

	Gasoline Throughput Million Gallons / Year	VOC Tons Per Year	HAP Tons Per Year
CURRENT	167,137,650	40.7	1.08
POTENTIAL	730,537,800	114.5	3.116

Under Subpart R, 40 CFR 63.420 (a) (2), the affected facility to which the provisions of the subpart apply is each bulk gasoline terminal except those bulk gasoline terminals, "For which the owner or operator has documented and recorded to the Administrator's satisfaction that the facility is not a major source,..."

Under 40 CFR 63, "major source" is defined in Subpart A and is a source with actual or potential HAP emissions, considering controls, of ten or more tons per year of a single HAP or twenty-five or more tons per year of any combination of HAP's. When using the inventory determination described in 40 CFR 63.420 (a) (2), the subpart R record keeping requirements contained in 63.428 (i) & (j) do not apply and, as stated in 40 CFR 63.420 (f) as amended 2-28-97, the source is not required to submit it's inventory determination unless requested by the administrator.

A. Limitations

1. Annual Throughput Gasoline - The facility shall not have an annual throughput of a combination of gasoline and ethanol in excess of 730,537,800 gallons per year, to be calculated monthly by adding the most recently completed monthly totals to the total of the previous eleven months. This was incorporated into the original Title V permit and carried forward into this renewal. Additionally this throughput was stipulated in the Title V renewal application.
2. Annual HAP Emissions - Annual hazardous air pollutant (HAP) emissions shall be less than ten tons per year for any single HAP and less than twenty-five tons per year for total HAP's. The HAP's most likely to be emitted are listed in Table 3 above. The emissions shall be calculated annually as a part of the annual emissions update using the current version of the EPA TANKS model.

B. Monitoring

Conditions V.B.1 and V.B.2 - The method of compliance determination for the facility includes monthly inspections of pressure relief devices, valves, flanges, sampling connections or other connection devices in the gasoline liquid transfer or vapor collection system, and proper operation and maintenance of all equipment, including air pollution control equipment. Logs of monthly inspections, written procedures for equipment, operator training records, and records of scheduled and unscheduled maintenance ensure that VOC emissions from the facility are minimal.

40 CFR 64, Compliance Assurance Monitoring (CAM) -

CAM applies to each emissions unit at a major stationary source required to obtain a Title V permit that meets all of the following: 1) has a point source emission unit with a control device, 2) has emissions subject to an applicable rule, and 3) has uncontrolled emissions that exceed the major source threshold. 40 CFR 64.2(b)(1)(vi) states that the requirements of Part 64 do not apply to emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method. Motiva Springfield employs a continuous emissions monitor; therefore, the monitoring requirements of 40 CFR 64 are exempted.

C. Recordkeeping

Conditions V.C.1 – 10 include requirements for maintaining records of all monitoring and testing required by the permit. These records include monthly throughput records, VOC emission calculations, records of inspections, maintenance and operation records, and excess emissions reports.

D. Testing

The permit does not require source compliance emission tests. If compliance emission testing is required, the permittee shall use appropriate methods in accordance with procedures approved by the DEQ. The Department and EPA have authority to require

testing not included in this permit if necessary to determine compliance with an emission limit or standard.

E. Reporting

Conditions V.E.1 – 3 include annual reporting requirements. Condition V.E.4 requires a certification by the facilities responsible official for specified documents provided to the DEQ.

Condition VI. Insignificant Emission Units

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation¹	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Working Capacity (9 VAC 5-80-720 C)
T08	Distillate Tank (Diesel, Jet A, Kerosene)	9 VAC 5-80-720B	VOC	2,140,320 gal.
T09	Distillate Tank (Diesel, Jet A, Kerosene)	9 VAC 5-80-720B	VOC	2,128,980 gal
T11	Gasoline Additive Tank	9 VAC 5-80-720B	VOC	6,800 gal.
T12	Gasoline Additive Tank	9 VAC 5-80-720B	VOC	10,080 gal.
T13	Distillate Tank (Diesel, Jet A, kerosene)	9 VAC 5-80-720B	VOC	17,720 gal.
T14	Gasoline Additive Tank	9 VAC 5-80-720B	VOC	3,400 gal.
T15	Gasoline Additive Tank	9 VAC 5-80-720B	VOC	1,260 gal
T16	Gasoline Additive Tank	9 VAC 5-80-720B	VOC	10,200 gal
T18	Gasoline Additive Tank	9 VAC 5-80-720B	VOC	2,500 gal.

Insignificant emission units (cont.)

Emission Unit No.	Emission Unit Description	Citation ¹	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Working Capacity (9 VAC 5-80-720 C)
SI	Interface Tank	9 VAC 5-80-720B	VOC	25,120 gal.
W1	Petroleum Contact Water Tank	9 VAC 5-80-720B	VOC	15,490 gal.
OWS	Oil-water Separators (2)	9 VAC 5-80-720B	VOC	N/A
FO2	Fugitive Equipment Leaks	9 VAC 5-80-720B	VOC	N/A
SRB	Storm water retention basin	9 VAC 5-80-720B	N/A	79,802 gal/yr storm water
DL1	Distillate Loading	9 VAC 5-80-720B	VOC	245,481,600 gal/yr throughput

¹The citation criteria for insignificant activities are as follows:

- 9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
- 9 VAC 5-80-720 B - Insignificant due to emission levels
- 9 VAC 5-80-720 C - Insignificant due to size or production rate

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Condition VII. INAPPLICABLE REQUIREMENTS

The following requirements have been identified as inapplicable:

Citation	Title of Citation	Description of Applicability
9 VAC 5-40 -3410 through 3550 (Rule 4-25)	Emission standards for VOC storage and transfer operations	The facility is subject to Rule 4-37 and is therefore exempt from the requirements of Rule 4-25.
40 CFR 60 Subpart XX	Standards of Performance for Bulk Gasoline Terminals	The Subpart applies to affected facilities which were constructed or modified after 12/17/80. The existing loading rack was built prior to December 7, 1980 and has not had any modifications since their construction.
40 CFR 60 Subpart K	Standards of performance for storage vessels for petroleum liquids for which construction, reconstruction, or modification commenced after June 11, 1973, and prior to May 19, 1978	There are no tanks at the facility which meet the requirements of this Subpart K.

Inapplicable Requirements (cont.)

Citation	Title of Citation	Description of Applicability
40 CFR 60 Subpart Ka	Standards of performance for storage vessels for petroleum liquids for which construction, reconstruction, or modification commenced after May 18, 1978, and prior to July 23, 1984	There are no tanks at the facility which meet the requirements of this Subpart Ka.
40 CFR 63 Subpart R	National Emission Standard for Gasoline Distribution – Stage 1	Emissions are below 10 TPY for a single HAP and below 25 TPY for a combination of HAP's.
40 CFR 64	Compliance Assurance Monitoring	Facility employs a CEMS which meets exemption criterion of 40 CFR64.2(b)(1)
40 CFR 68	Accidental release prevention requirements: Section 112 (r)	Petroleum liquids (gasoline, diesel, jet fuel, etc) are not subject to this rule.

Streamlined Requirements

1. Condition III.B.1 – The reference to Tank T04 in Condition 3 of the 4/15/08 NSR Permit has not been included in of the federal operating permit because the tank is already filled with gasoline.
2. Condition IV.A.2 - The facility is subject to the existing source regulation, 9 VAC 5-40-5220 C which prohibits the discharge of VOC's in excess of 0.67 lbs per 1,000 gallons (80 mg/l) of gasoline loaded. This requirement is streamlined because the facility accepted the more restrictive emission rate of 35 mg of TOC / liter of gasoline loaded, established in Subpart XX, 60.502(b).
3. Condition IV.A.4 - The facility is subject to the existing source regulation, 9 VAC 5-40-5220 G, which requires that tank trucks loaded or unloaded at bulk terminals be designed, maintained, and certified to be vapor tight. The facility is permitted for a more restrictive program established in Subpart XX, 60.502; therefore, the existing source regulation is streamlined.
4. Condition IV.B.1 - The foundation for this requirement is the existing source regulation 9 VAC 5-40-5220 G.7, but, the condition reflects NSPS Subpart XX, 40 CFR 60.502 (j), which is more restrictive. The existing source regulation is streamlined

Condition VIII. GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

B. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit applications has been delegated to the Regions as allowed by §2.1-20.01:2 and §10.1-1185 of the *Code of Virginia*, and the "Department of Environmental Quality Agency Policy Statement No. 3-2001".

This general condition cites the Articles that follows:

Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:

9 VAC 5-80-80. Application
9 VAC 5-80-140. Permit Shield
9 VAC 5-80-150. Action on Permit Applications

D. Annual Compliance Certification

In 2010 EPA issued revised submittal requirements in that the annual certification to EPA shall only be submitted in electronic format to the email address, R3_APD_Permits@epa.gov

F. Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

This general condition cites the sections that follow:

9 VAC 5-40-41 Emissions Monitoring Procedures for Existing Sources
9 VAC 5-40-50 Notification, Records and Reporting
9 VAC 5-50-50 Notification, Records and Reporting

This general condition contains a citation from the Code of Federal Regulations as follows:
40 CFR 60.13 (h) Monitoring Requirements.

J. Permit Modification

This general condition cites the sections that follow:

9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources

9 VAC 5-80-190. Changes to Permits.

9 VAC 5-80-260. Enforcement.

9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources

9 VAC 5-80-1790. Applicability, Permits For Major Stationary Sources and Modifications
Located in Prevention of Significant Deterioration Areas

9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications
Locating in Nonattainment Areas

U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

This general condition cites the sections that follow:

9 VAC 5-20-180. Facility and Control Equipment Maintenance or Malfunction

9 VAC 5-80-110. Permit Content

Y. Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains citations from the Code of Federal Regulations as follow:

40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.

40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.

40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.

This general condition cites the regulatory sections that follow:

9 VAC 5-60-70. Designated Emissions Standards

9 VAC 5-80-110. Permit Content

FUTURE APPLICABLE REQUIREMENTS

The gasoline distribution bulk terminal is not subject to 40 CFR 63, Subpart R and is therefore subject to 40 CFR 63, Subpart BBBBBB. The facility is defined as an existing source and as

such must comply with the standards in this subpart no later than January 10, 2011. The facility will be subject to those requirements no later than that date.

COMPLIANCE PLAN

Motiva Springfield is currently in compliance with all applicable requirements. No compliance plan was included in the application or the permit.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit will be placed on public notice in the Washington Examiner on July 12, 2010 with the public comment period from July 13, 2010 to August 12, 2010.

ATTACHMENT 1

Ms. Susan Horning Letter of Extension



NRO-296-09

COMMONWEALTH of VIRGINIA

**DEPARTMENT OF ENVIRONMENTAL QUALITY
NORTHERN REGIONAL OFFICE**

L. Preston Bryant, Jr.
Secretary of Natural Resources

13901 Crown Court, Woodbridge, Virginia 22193-1453
(703) 583-3800 Fax (703) 583-3821
www.deq.virginia.gov

David K. Paylor
Director

Thomas A. Faha
Regional Director

September 30, 2009

Ms. Susan Horning
Terminal Manager
Motiva Enterprises LLC
3800 Pickett Road
Fairfax, VA 22031

Re: Extension for T03 IFR Registration No.: 70234

Dear Ms. Horning,

This letter acknowledges receipt of your letter dated September 4, 2009. The Department of Environmental Quality (DEQ) Northern Regional Office (NRO) staff has reviewed your request for an eighteen month extension to construct the internal floating roof in Tank T03 at the Springfield Terminal. Such an extension may be granted by the DEQ as stated in Condition 11 of your permit dated April 15, 2008.

As indicated by the email dated September 28, 2009, from Mr. Tom Jackson, the facility was has not commenced construction because business needs have not warranted the conversion to an internal floating roof tank. Because of the unanticipated business delay, your request is considered reasonable. Therefore, the DEQ approves the request for an extension of the project for eighteen months.

If there are further delays that prevent commencement of the project by April 15, 2011, the portion of the permit pertaining to the modification of Tank T03 becomes invalid, and a new permit application may be required. You are reminded that all other conditions of the permit remain the same, and that operating the tank out of compliance with any state or federal regulation could result in enforcement action.

If you have any questions, please contact me at 703.583.3800.

Sincerely,

Terry H. Darton
Regional Air Permit Manager

THD/MCL/09-296-ltr

Cc: Tom Jackson, Motiva (via electronic communication)

Event	Date	Initials
Code: PRCD	9/30/09	mcl
Scanned		
QC		

ATTACHMENT 2

2009 ANNUAL UPDATE

ATTACHMENT 3

2009 EMISSION INVENTORY

**Commonwealth of Virginia
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EBENZ	0.0080000000
ISPBZ	0.0004000000
MTBE	0.0820000000
NHEXA	0.1290000000
TOLU	0.1070000000
VOC	26.5300000000
XYLS	0.0380000000

POINT INFORMATION: Number: 1 Description: Tanks 1, 2, 4, 5, 6, 7 & 10

Design Capacity & Units: 0
Per
% Throughput: DEC-FEB: 25 MAR-MAY: 27 JUN-AUG: 24 SEP-NOV: 24
Operating Schedule: Hours/Day: 24 Days/Week: 7 Hours/Year: 8760

State Sensitive: N
Permitted Equipment: N
Space Heat (%): 0
Air Program Sub Part

Point Emissions	Pollutant	Emissions Value (tpy)	Allowable Value Units
	224TM	0.1470000000	
	BZ	0.0730000000	
	EBENZ	0.0080000000	
	ISPBZ	0.0004000000	
	MTBE	0.0820000000	
	NHEXA	0.1290000000	
	TOLU	0.1070000000	
	VOC	26.5300000000	
	XYLS	0.0380000000	

SEGMENT INFORMATION: Number: 1 Description: IFR Gasoline/Distillate Fuel Storage Tanks (Tanks 1, 2, 4, 5, 6, 7 & 10) - Total Storage Capacity (Breathing Losses)

Source Classification Code: 4040011
Actual Annual Throughput: 14056.14
Max. Hourly Operation Rate: 0
State Sensitive: N
Permitted Equipment: Y
Insignificant Activity: N
Pollution Prevention: N

SCC Description: Gasoline RVP 10: Standing Loss (67000 Bbl Capacity)-Floating Roof Tank
SCC Units: 1000 Gallons Storage Capacity
Trace%: 0 Ash%: 0 Sulfur%: 0
Heat Content (MMBTU): 0
Throughput Limit:
Throughput Unit:

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Pollution Prevention Comments:

Segment Comments: For CY2008, 90% of Tank 1 thruput is listed as ethanol throughput and 10% is listed as gasoline rack thruput.

Segment Emissions		Factor	A/S/T	Primary Control	Secondary Control	Overall Efficiency %	Emissions Value (tpy)	Allowable Value	Units
Pollutant	Method								
VOC	AP-42 factor (user calc)	0.0000000000					26.29000000		
Storage Tank Emission Estimates were obtained using the latest version of the EPA TANKS Program (version 4.0.9d).									
224TM	Engr judgement (user calc)	0.0000000000					0.14700000		
BZ	Engr judgement (user calc)	0.0000000000					0.07300000		
EBENZ	Engr judgement (user calc)	0.0000000000					0.00800000		
ISPBZ	Engr judgement (user calc)	0.0000000000					0.00040000		
MTBE	Engr judgement (user calc)	0.0000000000					0.08200000		
NHEXA	Engr judgement (user calc)	0.0000000000					0.12900000		
TOLU	Engr judgement (user calc)	0.0000000000					0.10700000		
XYLS	Engr judgement (user calc)	0.0000000000					0.03800000		

SEGMENT INFORMATION:	Number: 2	Description:	IFR Gasoline/Distillate Fuel Storage Tanks (Tanks 1, 2, 4, 5, 6, 7 & 10) - Withdrawal (Working Losses)		
Source Classification Code:	40400116	SCC Description:	Gasoline RVP 13/10/7: Withdrawal Loss (67000 Bbl Cap.) - Float Rf Tnk		
Actual Annual Throughput:	209973.74	SCC Units:	1000 Gallons Throughput		
Max. Hourly Operation Rate:	0	Trace%:	0	Ash%:	0
State Sensitive:	N	Sulfur%:	0		
Permitted Equipment:	Y	Heat Content (MMBTU):	0		
Insignificant Activity:	N	Throughput Limit:			
Pollution Prevention:	N	Throughput Unit:			

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Pollution Prevention Comments:
Segment Comments:

Segment Emissions		Factor	A/S/T	Primary Control	Secondary Control	Overall Efficiency %	Emissions Value (tpy)	Allowable Value	Units
Pollutant	Method								
VOC	AP-42 factor (user calc)	0.000000000					0.24000000		

Storage Tank Emission Estimates were obtained using the latest version of the EPA TANKS Program (version 4.0.9d).

STACK INFORMATION:		Number: 2	Description: Gasoline Tank Truck Loading via Loading Rack	UTM Zone:	18
Stack Height(ft):	0			UTM Vertical(KM):	4289.19
Stack Diameter(ft):	0			UTM Horizontal(KM):	309.29
Exit Gas Temperature(F):	0			GEP Stack Height:	0
Gas Flow Rate(ACFM):	0			GEP Building Height:	0
Exit Gas Velocity(ft/sec):	0			GEP Building Length:	0
Stack Type:	F			GEP Building Width:	0
Plume Height(ft):	30			Rough Terrain:	N
Permitted Equipment:	N			Elevation (ft above MSL):	120

Stack Emissions	Pollutant	Emissions Value (tpy)	Allowable Value	Units
	224TM	0.067000000		
	BZ	0.033000000		
	EBENZ	0.004000000		
	ISPBZ	0.000200000		
	MTBE	0.037000000		
	NHEXA	0.058000000		
	TOLU	0.049000000		
	VOC	10.1628890295		
	XYLS	0.017000000		

POINT INFORMATION:		Number: 2	Description: Gasoline Tank Truck Loading via Loading Rack	State Sensitive:	N
Design Capacity & Units:	144000 GALLONS			Permitted Equipment:	N
	Per HOUR			Space Heat (%):	0
% Throughput:	DEC-FEB: 24	MAR-MAY: 25	JUN-AUG: 25	SEP-NOV: 26	

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Operating Schedule: Hours/Day: 24 Days/Week: 7 Hours/Year: 8760

Air Program Sub Part

Point Emissions	Pollutant	Emissions Value (tpy)	Allowable Value	Units
	224TM	0.0670000000		
	BZ	0.0330000000		
	EBENZ	0.0040000000		
	ISPBZ	0.0002000000		
	MTBE	0.0370000000		
	NHEXA	0.0580000000		
	TOLU	0.0490000000		
	VOC	10.1628890295		
	XYLS	0.0170000000		

SEGMENT INFORMATION: Number: 1		Description: Gasoline Tank Truck Loading via Loading Rack			
Source Classification Code:	40600141	SCC Description:	Gasoline: Submerged Loading (Balanced Service)		
Actual Annual Throughput:	167137.65	SCC Units:	1000 Gallons Transferred		
Max. Hourly Operation Rate:	0	Trace%:	0	Ash%:	0
State Sensitive:	N	Heat Content (MMBTU):	0		
Permitted Equipment:	Y	Throughput Limit:			
Insignificant Activity:	N	Throughput Unit:			
Pollution Prevention:	N				

Pollution Prevention Comments:
Segment Comments:

Segment Emissions		Factor	A/S/T	Primary Control	Secondary Control	Overall Efficiency %	Emissions Value (tpy)	Allowable Value	Units
Pollutant	Method								
VOC	Supplied factor (auto calc)	0.0583000000		048			4.87206249		
Controlled Emission Factor of 6.99 mg/L (equivalent to 0.0583 lb/1000 gallons 048 = Activated Carbon Adsorption of gasoline loaded) based on VRU Test Results from Performance Test on 2/6/03.									
224TM	Engr judgement (user calc)	0.0000000000					0.03700000		
BZ	Engr judgement (user calc)	0.0000000000					0.01800000		

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EBENZ	Engr judgement (user calc)	0.000000000	0.00200000
ISPBZ	Engr judgement (user calc)	0.000000000	0.00010000
MTBE	Engr judgement (user calc)	0.000000000	0.02000000
NHEXA	Engr judgement (user calc)	0.000000000	0.03200000
TOLU	Engr judgement (user calc)	0.000000000	0.02700000
XYLS	Engr judgement (user calc)	0.000000000	0.00900000

SEGMENT INFORMATION: Number: 2

Description: Tank Truck Loading Losses (MACT)

Source Classification Code:	40400154	SCC Description:	Tank Truck Vapor Leaks
Actual Annual Throughput:	158407.98	SCC Units:	1000 Gallons Transferred
Max. Hourly Operation Rate:	0	Trace%:	0
State Sensitive:	N	Ash%:	0
Permitted Equipment:	Y	Sulfur%:	0
Insignificant Activity:	N	Heat Content (MMBTU):	0
Pollution Prevention:	N	Throughput Limit:	
		Throughput Unit:	

Pollution Prevention Comments:
Segment Comments:

Segment Emissions		Factor	A/S/T	Primary Control	Secondary Control	Overall Efficiency %	Emissions Value (tpy)	Allowable Value	Units
Pollutant	Method								
VOC	Supplied factor (auto calc)	0.066800000					5.29082653		
Emission Factor of 8.0 mg/L (equivalent to 0.0668 lb/1000 gallons of gasoline loaded) based on MACT Factor.									
224TM	Engr judgement (user calc)	0.000000000					0.03000000		
BZ	Engr judgement (user calc)	0.000000000					0.01500000		
EBENZ	Engr judgement (user calc)	0.000000000					0.00200000		

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ISPBZ	Engr judgement (user calc)	0.000000000	0.000100000
MTBE	Engr judgement (user calc)	0.000000000	0.017000000
NHEXA	Engr judgement (user calc)	0.000000000	0.026000000
TOLU	Engr judgement (user calc)	0.000000000	0.022000000
XYLS	Engr judgement (user calc)	0.000000000	0.008000000

STACK INFORMATION: Number: 3		Description: Fixed Roof Storage Tanks 3, 8, 9, 11, 12, 13, 14, 15, 16, S1, W1			UTM Zone: 18	
Stack Height(ft):	0				UTM Vertical(KM):	4289.19
Stack Diameter(ft):	0				UTM Horizontal(KM):	309.29
Exit Gas Temperature(F):	0				GEP Stack Height:	0
Gas Flow Rate(ACFM):	0				GEP Building Height:	0
Exit Gas Velocity(ft/sec):	0				GEP Building Length:	0
Stack Type:	F				GEP Bulding Width:	0
Plume Height(ft):	30				Rough Terrain:	N
Permitted Equipment:	N				Elevation (ft above MSL):	120
Stack Emissions	Pollutant	Emissions Value (tpy)	Allowable Value	Units		
	224TM	0.002000000				
	BZ	0.001000000				
	EBENZ	0.027000000				
	ISPBZ	0.030000000				
	MTBE	0.001000000				
	NHEXA	0.029000000				
	TOLU	0.049000000				
	VOC	2.860000000				
	XYLS	0.003000000				

POINT INFORMATION: Number: 3		Description: Fixed Roof Storage Tanks 3, 8, 9, 11, 12, 13, 14, 15, 16, S1, W1			State Sensitive: N		
Design Capacity & Units:	0				Permitted Equipment:	Y	
	Per				Space Heat (%):	0	
% Throughput: DEC-FEB:	25	MAR-MAY:	31	JUN-AUG:	24	SEP-NOV:	20
Operating Schedule: Hours/Day:	24	Days/Week:	7	Hours/Year:	8760	Air Program	Sub Part

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Point Emissions	Pollutant	Emissions Value (tpy)	Allowable Value Units
	224TM	0.0020000000	
	BZ	0.0010000000	
	EBENZ	0.0270000000	
	ISPBZ	0.0300000000	
	MTBE	0.0010000000	
	NHEXA	0.0290000000	
	TOLU	0.0490000000	
	VOC	2.8600000000	
	XYLS	0.0930000000	

SEGMENT INFORMATION: Number: 1 Description: Fixed Roof Storage Tanks 3, 8, 9, 11, 12, 13, 14, 15, 16, S1, W1 - Total Storage Capacity (Breathing Losses)

Source Classification Code: 40301016 SCC Description: Jet Kerosene: Breathing Loss (67000 Bbl. Tank Size)

Actual Annual Throughput: 4823.06 SCC Units: 1000 Gallons Storage Capacity

Max. Hourly Operation Rate: 0 Trace%: 0 Ash%: 0 Sulfur%: 0

State Sensitive: N Heat Content (MMBTU): 0

Permitted Equipment: Y Throughput Limit:

Insignificant Activity: N Throughput Unit:

Pollution Prevention: N

Pollution Prevention Comments:
Segment Comments:

Segment Emissions		Factor	A/S/T	Primary Control	Secondary Control	Overall Efficiency %	Emissions Value (tpy)	Allowable Value	Units
Pollutant	Method								
224TM	Engr judgement (user calc)	0.0000000000					0.00200000		
BZ	Engr judgement (user calc)	0.0000000000					0.00100000		
EBENZ	Engr judgement (user calc)	0.0000000000					0.01400000		
ISPBZ	Engr judgement (user calc)	0.0000000000					0.03000000		
MTBE	Engr judgement (user calc)	0.0000000000					0.00100000		

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NHEXA	Engr judgement (user calc)	0.000000000	0.00800000
TOLU	Engr judgement (user calc)	0.000000000	0.01200000
VOC	AP-42 factor (user calc)	0.000000000	1.20000000
Calculated using TANKS program.			
XYLS	Engr judgement (user calc)	0.000000000	0.05000000

SEGMENT INFORMATION: Number: 2 Description: Fixed Roof Storage Tanks 3, 8, 9, 11, 12, 13, 14, 15, 16, S1, W1 - Withdrawal (Working Losses)

Source Classification Code: 40301018 SCC Description: Jet Kerosene: Working Loss (Tank Diameter Independent)

Actual Annual Throughput: 115606.96 SCC Units: 1000 Gallons Throughput

Max. Hourly Operation Rate: 0 Trace%: 0 Ash%: 0 Sulfur%: 0

State Sensitive: N Heat Content (MMBTU): 0

Permitted Equipment: Y Throughput Limit:

Insignificant Activity: N Throughput Unit:

Pollution Prevention: N

Pollution Prevention Comments:
Segment Comments:

Segment Emissions									
Pollutant	Method	Factor	A/S/T	Primary Control	Secondary Control	Overall Efficiency %	Emissions Value (tpy)	Allowable Value	Units
EBENZ	Engr judgement (user calc)	0.000000000					0.01300000		
NHEXA	Engr judgement (user calc)	0.000000000					0.02100000		
TOLU	Engr judgement (user calc)	0.000000000					0.03700000		
VOC	AP-42 factor (user calc)	0.000000000					1.66000000		
Calculated using TANKS program.									
XYLS	Engr judgement (user calc)	0.000000000					0.04300000		

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STACK INFORMATION: Number: 4
 Stack Height(ft): 0
 Stack Diameter(ft): 0
 Exit Gas Temperature(F): 0
 Gas Flow Rate(ACFM): 0
 Exit Gas Velocity(ft/sec): 0
 Stack Type: F
 Plume Height(ft): 30
 Permitted Equipment: N

Description: Jet Fuel Tank Truck Bottom Load

UTM Zone: 18
 UTM Vertical(KM): 4289.19
 UTM Horizontal(KM): 309.29
 GEP Stack Height: 0
 GEP Building Height: 0
 GEP Building Length: 0
 GEP Building Width: 0
 Rough Terrain: N
 Elevation (ft above MSL): 120

Stack Emissions	Pollutant	Emissions Value (tpy)	Allowable Value	Units
	VOC	0.0313880100		

POINT INFORMATION: Number: 4
 Design Capacity & Units: 0
 Per
 % Throughput: DEC-FEB: 22 MAR-MAY: 26 JUN-AUG: 24 SEP-NOV: 28
 Operating Schedule: Hours/Day: 24 Days/Week: 7 Hours/Year: 8760

Description: Jet Fuel Tank Truck Bottom Load

State Sensitive: N
 Permitted Equipment: N
 Space Heat (%): 0
 Air Program: Sub Part

Point Emissions	Pollutant	Emissions Value (tpy)	Allowable Value	Units
	VOC	0.0313880100		

SEGMENT INFORMATION: Number: 1
 Source Classification Code: 40600134
 Actual Annual Throughput: 4452.2
 Max. Hourly Operation Rate: 0
 State Sensitive: N
 Permitted Equipment: Y
 Insignificant Activity: N
 Pollution Prevention: N

Description: Jet Fuel Tank Truck Bottom Load via Loading Rack w/ VRU

SCC Description: Kerosene: Submerged Loading (Normal Services)
 SCC Units: 1000 Gallons Transferred
 Trace%: 0 Ash%: 0 Sulfur%: 0
 Heat Content (MMBTU): 0
 Throughput Limit:
 Throughput Unit:

Pollution Prevention Comments:
 Segment Comments:

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Segment Emissions		Factor	A/S/T	Primary Control	Secondary Control	Overall Efficiency %	Emissions Value (tpy)	Allowable Value	Units
Pollutant	Method								
VOC	Supplied factor (auto calc)	0.0141000000		048			0.03138801		
Controlled Emission Factor of 1.69 mg/L (equivalent to 0.0141 lb/1000 gallons 048 = Activated Carbon Adsorption of middle distillate fuels loaded) based on AP-42 (source facility cited)									

STACK INFORMATION:		Number:	Description:	Facility Fugitive Losses	UTM Zone:	18
Stack Height(ft):	0				UTM Vertical(KM):	4289.19
Stack Diameter(ft):	0				UTM Horizontal(KM):	309.29
Exit Gas Temperature(F):	0				GEP Stack Height:	0
Gas Flow Rate(ACFM):	0				GEP Building Height:	0
Exit Gas Velocity(ft/sec):	0				GEP Building Length:	0
Stack Type:	F				GEP Bulding Width:	0
Plume Height(ft):	30				Rough Terrain:	N
Permitted Equipment:	N				Elevation (ft above MSL):	120
Stack Emissions	Pollutant	Emissions Value (tpy)	Allowable Value	Units		
	VOC	1.1100000000				

POINT INFORMATION:		Number:	Description:	Facility Fugitive Losses	State Sensitive:	N
Design Capacity & Units:	0				Permitted Equipment:	N
	Per				Space Heat (%):	0
% Throughput:	DEC-FEB: 24	MAR-MAY: 26	JUN-AUG: 25	SEP-NOV: 25	Air Program	Sub Part
Operating Schedule:	Hours/Day: 24	Days/Week: 7	Hours/Year: 8760			
Point Emissions	Pollutant	Emissions Value (tpy)	Allowable Value	Units		
	VOC	1.1100000000				

SEGMENT INFORMATION:		Number:	Description:	Facility Fugitive Losses	SCC Description:	Valves, Flanges, and Pumps
Source Classification Code:	40400151				SCC Units:	1000 Gallons Transferred
Actual Annual Throughput:	332799.05				Trace%:	0
Max. Hourly Operation Rate:	0				Ash%:	0
State Sensitive:	N				Sulfur%:	0

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Permitted Equipment: N Heat Content (MMBTU): 0
 Insignificant Activity: N Throughput Limit:
 Pollution Prevention: N Throughput Unit:

Pollution Prevention Comments:
 Segment Comments:

Segment Emissions		Factor	A/S/T	Primary Control	Secondary Control	Overall Efficiency %	Emissions Value (tpy)	Allowable Value	Units
Pollutant	Method								
VOC	AP-42 factor (user calc)	0.0000000000					1.110000000		

Factors based on EPA Protocol for Equipment Leak Emission Estimates, EPA-453-R-95-017, November 1995, Table 2.3 Marketing Terminal Average Emission Factors. Spreadsheet with facility specific components (number & types) along with emission factors included with emission statement (Note: these emissions are not expected to change much from year to year).

STACK INFORMATION:		Number:	Description:	UTM Zone:
Stack Height(ft):	0	6	Interface, Bottom Loading	18
Stack Diameter(ft):	0			UTM Vertical(KM): 4289.2
Exit Gas Temperature(F):	0			UTM Horizontal(KM): 309.3
Gas Flow Rate(ACFM):	0			GEP Stack Height: 0
Exit Gas Velocity(ft/sec):	0			GEP Building Height: 0
Stack Type:	F			GEP Building Length: 0
Plume Height(ft):	30			GEP Bulding Width: 0
Permitted Equipment:	N			Rough Terrain: N
				Elevation (ft above MSL): 120
Stack Emissions	Pollutant	Emissions Value (tpy)	Allowable Value	Units
	VOC	0.0030000000		

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POINT INFORMATION: Number: 6 Description: Interface, Bottom Loading

Design Capacity & Units: 0
Per
% Throughput: DEC-FEB: 25 MAR-MAY: 25 JUN-AUG: 25 SEP-NOV: 25
Operating Schedule: Hours/Day: 24 Days/Week: 7 Hours/Year: 8760

State Sensitive: N
Permitted Equipment: N
Space Heat (%): 0
Air Program Sub Part

Point Emissions	Pollutant	Emissions Value (tpy)	Allowable Value	Units
	VOC	0.0030000000		

SEGMENT INFORMATION: Number: 1 Description: INTERFACE, BOTTOM LOADING

Source Classification Code: 40600141 SCC Description: Gasoline: Submerged Loading (Balanced Service)
Actual Annual Throughput: 102.49
Max. Hourly Operation Rate: 0 SCC Units: 1000 Gallons Transferred
State Sensitive: N Trace%: 0 Ash%: 0 Sulfur%: 0
Permitted Equipment: Y Heat Content (MMBTU): 0
Insignificant Activity: N Throughput Limit:
Pollution Prevention: N Throughput Unit:

Pollution Prevention Comments:
Segment Comments:

Segment Emissions		Factor	A/S/T	Primary Control	Secondary Control	Overall Efficiency %	Emissions Value (tpy)	Allowable Value	Units
Pollutant	Method								
VOC	AP-42 factor (user calc) Calculated using TANKS program.						0.003000000		

STACK INFORMATION: Number: 7 Description: Diesel Fuel Loading via Loading Rack w/ VRU

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Stack Height(ft): 0
 Stack Diameter(ft): 0
 Exit Gas Temperature(F): 0
 Gas Flow Rate(ACFM): 0
 Exit Gas Velocity(ft/sec): 0
 Stack Type: F
 Plume Height(ft): 30
 Permitted Equipment: N

UTM Zone: 18
 UTM Vertical(KM): 4289.2
 UTM Horizontal(KM): 309.3
 GEP Stack Height: 0
 GEP Building Height: 0
 GEP Building Length: 0
 GEP Building Width: 0
 Rough Terrain: N
 Elevation (ft above MSL): 120

Stack Emissions	Pollutant	Emissions Value (tpy)	Allowable Value	Units
	VOC	0.000000000		

POINT INFORMATION: Number: 7 Description: Diesel Fuel Loading via Loading Rack w/ VRU

Design Capacity & Units: 0
 Per
 % Throughput: DEC-FEB: 25 MAR-MAY: 25 JUN-AUG: 25 SEP-NOV: 25
 Operating Schedule: Hours/Day: 24 Days/Week: 7 Hours/Year: 8760

State Sensitive: N
 Permitted Equipment: N
 Space Heat (%): 0
 Air Program: Sub Part

Point Emissions	Pollutant	Emissions Value (tpy)	Allowable Value	Units
	VOC	0.000000000		

SEGMENT INFORMATION: Number: 1 Description: Diesel Fuel Loading via Loading Rack w/ VRU

Source Classification Code: 40600135 SCC Description: Distillate Oil: Submerged Loading (Normal Service)
 Actual Annual Throughput: 0
 Max. Hourly Operation Rate: 0 SCC Units: 1000 Gallons Transferred
 State Sensitive: N Trace%: 0 Ash%: 0 Sulfur%: 0
 Permitted Equipment: N Heat Content (MMBTU): 0
 Insignificant Activity: N Throughput Limit:
 Pollution Prevention: N Throughput Unit:

Pollution Prevention Comments:
 Segment Comments:

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Segment Emissions		Factor	A/S/T	Primary Control	Secondary Control	Overall Efficiency %	Emissions Value (tpy)	Allowable Value	Units
Pollutant	Method								
VOC	Supplied factor (auto calc)	0.0141000000		048			0.00000000		
Controlled Emission Factor of 1.69 mg/L (equivalent to 0.0141 lb/1000 gallons 048 = Activated Carbon Adsorption of middle distillate fuels loaded) based on AP-42 (source facility cited)									