BACKGROUND

BP Products North America Inc., Curtis Bay Terminal (BP) owns and operates a petroleum bulk storage and transfer facility located at 801 East Ordnance Road, Baltimore, Maryland. The facility is located in Air Quality Area III, an ozone non-attainment area in Anne Arundel County. The primary standard industrial classification (SIC) code for this terminal is 5171.

The major activities at the facility include warehousing and storage of bulk petroleum products. The terminal receives petroleum products via marine transport vessels and pipeline, and distributes petroleum products via transport tank trucks. No gasoline is loaded into barges at this time.

The primary sources of air emissions at the facility include eight (8) bulk petroleum storage tanks, seventeen (17) smaller storage tanks (additive, slop, butane, fuel oil storage, etc.), a five lane truck loading rack, one (1) carbon adsorption/absorption vapor recovery unit (VRU), and one (1) vapor combustion unit (VCU). Volatile organic compounds (VOCs) emitted during transport tanker truck loading are controlled primarily by the VRU and the VCU for backup control.

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

Table 1: Actual Emissions

Year	NO_x (TPY)	SO_x (TPY)	PM_{10} (TPY)	CO (TPY)	VOC (TPY)	Total HAP (TPY)
2012	0.79	< 1.0	< 1.0	1.95	49.31	0.20
2011	2.34	< 1.0	< 1.0	5.82	40.93	1.42
2010	< 1.0	< 1.0	< 1.0	< 1.0	42.35	1.55
2009	< 1.0	< 1.0	< 1.0	0.07	44.93	1.59
2008	< 1.0	< 1.0	< 1.0	< 1.0	42.24	0.12

The major source threshold for triggering Title V permitting requirements in Anne Arundel County is 25 tons per year for VOC, 25 tons for NOx, and 100 tons per year for any other criteria pollutants and 10 tons for a single HAP or 25 tons per year for total HAPs. Since the actual VOC emissions from the facility are greater than the major source threshold, BP is required to obtain a Title V – Part 70 Operating Permit under COMAR 26.11.03.01.

BP's current Title V – Part 70 Operating Permit was issued on August 1, 2009 and expires on July 31, 2014. The facility's Title V – Part 70 Operating Permit renewal application was received by the Department on July 31, 2013. An administrative completeness review was conducted and the application was

deemed administratively complete. An administrative completeness letter was sent on August 8, 2013, granting BP an application shield. BP's Title V – Part 70 Operating Permit is being renewed at this time.

GREENHOUSE GAS (GHG) EMISSIONS

BP emits the following greenhouse gases (GHGs) related to Clean Air Act requirements: carbon dioxide, methane, and nitrous oxide. These GHGs originate from various processes (i.e., space heater, VCU) contained within the facility premises. The facility has not triggered Prevention of Significant Deterioration (PSD) requirements for GHG emissions; therefore, there are no applicable GHG Clean Air Act requirements. Emission certification reports for the years 2010, 2011, and 2012, showed that BP is a minor source (threshold: 100,000tpy CO_2e) for GHG's (see Table 3 shown below). The Permittee shall quantify facility wide GHG emissions and report them in accordance with Section 3 of the Part 70 permit.

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

Table 3: Greenhouse Gases Emissions Summary

GHG	Conversion factor	2010 tpy CO_2e	2011 tpy CO_2e	2012 tpy CO_2e
Carbon dioxide CO_2	1	34.8	134.2	45.1
Methane CH_4	21	< 1.0	< 1.0	< 1.0
Nitrous Oxide N_2O	310	< 1.0	< 1.0	< 1.0
Total GHG CO_{2eq}		**34.8**	**134.2**	**45.1**

CHANGES AND MODIFICATIONS TO THE PART 70 OPERATING PERMIT

The following changes or modifications have occurred since the last Title V – Part 70 Operating Permit was issued on August 1, 2009. These changes have been incorporated into the renewed Title V - Part 70 Operating Permit for BP:

Blending Butane with Gasoline Products at the Loading Rack
ARMA Permit to Construct No. 003-0309-9-0029 was issued on October 3, 2011, to modify the existing loading rack to allow blending butane with gasoline products. The following new pieces of equipment were permitted for blending butane with gasoline products:

- One (1) 60,000-gallon pressurized butane bullet (EU-12).
- One (1) 225-gallon ethanol day tank containing ethanol denatured with up to 5% gasoline.
- One (1) 225-gallon sample return tank containing a mixture of 90% gasoline and 10% denatured ethanol (EU-8).
- New pumps, valves, and flanges at the loading rack to allow for butane to be blended into gasoline product as trucks are filled at the loading rack.

BP notified the Department in a letter dated February 27, 2012, that the facility began loading butane into gasoline at the loading rack on February 26, 2012. All applicable requirements from ARMA Permit to Construct No. 003-0309-9-0029 issued on October 3, 2011 are incorporated into this renewed Title V – Part 70 Operating Permit.

NESHAP Requirements - 40 CFR, Part 63, Subpart BBBBBB for Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities

The requirements of Subpart BBBBBB are being included in BP's renewed Part 70 Operating Permit at this time. The requirements of Subpart BBBBBB were not included in the previously issued Title V permit because the requirements were not applicable to existing sources at the time the Part 70 Operating Permit was issued on August 1, 2009.

BP's terminal is considered an existing source with respect to 40 CFR, Part 63, Subpart BBBBBB because the equipment at the facility was not constructed or reconstructed, as defined in 40 CFR, Part 63, after November 9, 2006. Because BP is considered an existing source in accordance with 40 CFR §63.11082, BP was required to comply with the requirements of Subpart BBBBBB no later than January 10, 2011. The Department received BP's initial notification for Subpart BBBBBB on May 6, 2008 in accordance with 40 CFR §63.11093(a) and §63.9, and their Notification of Compliance Status Report on January 10, 2011, in accordance with 40 CFR §63.11093(b) and §63.9(h). Because BP has demonstrated compliance with the Notification of Compliance Status requirements, there are no Subpart BBBBBB requirements included in this permit pertaining to the Notification of Compliance Status.

BP is subject to the storage tank, equipment leak, and loading requirements of 40 CFR, Part 63, Subpart BBBBB.

NSPS AND NESHAP APPLICABILITY

NSPS Applicability

BP operates three (3) refined petroleum storage tanks primarily storing gasoline (EU-213R, EU-217V, and EU-218W) that are subject to 40 CFR Part 60, Subpart

Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. Each tank has a capacity greater than 75 cubic meters (approximately 19,800 gallons) and each tank was constructed or modified after July 23, 1984. The NSPS requirements of 40 CFR, Part 60, Subpart Kb are included in the Title V – Part 70 Operating Permit for these tanks.

BP is also subject to the requirements of 40 CFR, Part 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals. Subpart XX applies to loading racks constructed or modified after December 17, 1980. BP's loading rack was constructed in 1989 so that the loading rack at BP is subject to the requirements of Subpart XX. The NSPS requirements of 40 CFR, Part 60, Subpart XX are included in the Title V permit for these tanks.

No other NSPS regulations apply to BP at this time.

NESHAP Applicability

BP is a synthetic minor source with respect to HAP emissions. HAP emission limits and other operating limits are included in the Title V – Part 70 Operating permit. As a synthetic minor source, BP is not subject to the major source NESHAP requirements of 40 CFR, Part 63, Subpart R for Gasoline Distribution Facilities.

As previously mentioned, BP is subject to the requirements of the area source NESHAP, 40 CFR, Part 63, Subpart BBBBBB for Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities. The NESHAP requirements of 40 CFR, Part 63, Subpart BBBBBB are included in this Title V – Part 70 Operating permit renewal.

No other NESHAP regulations apply to BP at this time.

CAM APPLICABILITY

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

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

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

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

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

The loading rack at BP uses a VRU and a VCU to meet federally enforceable emission limits (COMAR 26.11.13.04A(1)(a) and 40 CFR §60.502(a) and (b)). The VOC emissions from the loading rack, pre-control, would be greater than the major source threshold of 25 tons per year. The loading rack is not subject to major source MACT requirements and is not otherwise exempt from CAM. A CAM plan is not required for the VRU because the use of a CEMS satisfies the requirements of 40 CFR, Part 64. A CAM plan is required for the VCU and is included in Table IV-5 CAM Plan of the renewal Title V – Part 70 Operating Permit.

EMISSION UNIT IDENTIFICATION

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

Table 2: Emission Unit Identification

All of the following emission units are registered under ARMA Registration No. 003-0309-9-0029.

Emissions Unit Number	Emissions Unit Name and Description	Date of Installation
EU-207L	One (1) 691,812-gallon distillate storage tank equipped with a cone roof.	1969
EU-208M	One (1) 3,200,689-gallon, gasoline storage tank equipped with an internal floating roof with a vapor mounted primary seal and a secondary wiper seal.	1926
EU-212Q	One (1) 3,342,053-gallon, gasoline storage tank equipped with an internal floating roof (originally an external floating roof now covered with a geodesic dome which, as a system, acts as an internal floating roof) with a liquid mounted primary seal and a secondary wiper seal.	1961
EU-213R	One (1) 3,335,066-gallon, gasoline storage tank equipped with a steel pan internal floating roof with a liquid mounted primary seal and a secondary wiper seal.	1995

EU-214S	One (1) 3,248,243-gallon, gasoline storage tank equipped with an internal floating roof (originally an external floating roof now covered with a geodesic dome which, as a system, acts as an internal floating roof) with a liquid mounted primary seal and a secondary wiper seal.	1929
EU-215T	One (1) 2,989,433-gallon, gasoline storage tank equipped with an internal floating roof with a liquid mounted primary seal and a secondary wiper seal.	1930
EU-217V	One (1) 2,974,134-gallon, gasoline storage swing tank equipped with an internal floating roof with a liquid mounted primary seal and a secondary wiper seal.	1930, modified in 1998 for gasoline service.
EU-218W	One (1) 3,111,005-gallon ethanol storage tank equipped with an internal floating roof (originally an external floating roof now covered with a geodesic dome which, as a system, acts as an internal floating roof) with a liquid mounted primary seal and a secondary wiper seal.	1931, modified in 2006 for ethanol storage.
EU-LR	A five lane loading rack controlled primarily by a John Zink vapor recovery unit (VRU). A John Zink vapor combustion unit (VCU) is used for back-up control.	1989, modified in 2006 and 2011.
EU-7	One (1) 300-gallon, fuel additive, horizontal storage tank.	2001
EU-8	One (1) 225-gallon sample return tank associated with the butane blending system. Note: this emission unit was previously for one (1) 300-gallon, fuel additive, horizontal storage tank.	2011
EU-9	One (1) 2,000-gallon, fuel additive, horizontal storage tank.	Unknown
EU-10	One (1) 8,000-gallon, fuel additive, horizontal storage tank.	1973
EU-11	One (1) 8,000-gallon, fuel additive, horizontal storage tank.	1973
EU-12	One (1) 60,000-gallon pressurized butane bullet. Note: EU-12 was previously a 12,000-gallon, slop refined petroleum products, horizontal storage tank which was taken out of service in 1999 and demolished in August of 2011.	2011
EU-13	One (1) 2,000-gallon, slop refined petroleum products, horizontal storage tank.	1997
EU-14	One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.	Unknown
EU-15	One (1) 10,000-gallon, fuel additive, horizontal storage tank.	Unknown
EU-16	One (1) 10,000-gallon, fuel additive, horizontal storage tank.	Unknown

EU-17	One (1) 8,000-gallon, fuel additive, horizontal storage tank.	Unknown
EU-18	One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.	Unknown
EU-19	One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.	Unknown
EU-20	One (1) 550-gallon, heating oil, horizontal storage tank.	2001
EU-23	One (1) 4,500-gallon, slop refined ethanol, horizontal storage tank.	2006
EU-24	One (1) 300-gallon, fuel additive, horizontal storage tank.	Unknown
EU-25	One (1) 550-gallon, fuel additive, horizontal storage tank.	Unknown
EU-26	One (1) 4,300-gallon, fuel additive, horizontal storage tank.	2004

Note: EU-7, 8, 9, 12, 13, 14, 18, 19, 20, 24, 25, and 207L are listed in the insignificant activities section.

AN OVERVIEW OF THE PART 70 PERMIT

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

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

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

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

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

keeping, and reporting requirements. The demonstration may include one or more of these methods.

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

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

REGULATORY REVIEW/TECHNICAL REVIEW/COMPLIANCE METHODOLOGY

Gasoline Storage Tanks – Emission Units EU-208M, 212Q, 214S, and 215T

BP maintains four (4) refined petroleum storage tanks (EU-208M, 212Q, 214S, and 215T). These emission units are large (greater than 40,000 gallons) closed-top, petroleum storage tanks with internal floating roofs equipped with primary and secondary seals. These tanks are currently used to store gasoline. In addition to gasoline, these tanks are permitted to store distillate oils and other refined petroleum products.

These tanks are not subject to the requirements of 40 CFR, Part 60, Subpart K, Ka, or Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) because they were not constructed, reconstructed or modified after July 11, 1973. All of these tanks were constructed prior 1970 and have not undergone any major modifications or reconstructions as defined in 40 CFR Part §60.14 and §60.15 at this time. These storage tanks are subject to the requirements of COMAR 26.11.13, Control of Gasoline and Volatile Organic Compound Storage and Handling and to the requirements of 40 CFR, Part 63, Subpart BBBBBB for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. In most cases, the requirements of 40 CFR, Part 63, Subpart BBBBBB reference the requirements of 40 CFR, Part 60, Subpart Kb as applicable standards.

The following is a description of the storage tanks included in Table IV-1 of the Part 70 Operating Permit.

EU-208M: One (1) 3,200,689-gallon, gasoline storage tank equipped with an internal floating roof with a vapor mounted primary seal and a secondary wiper seal.

EU-212Q: One (1) 3,342,053-gallon, gasoline storage tank equipped with an internal floating roof (originally an external floating roof now covered with a geodesic dome which, as a system, acts as an internal floating roof) with a liquid mounted primary seal and a secondary wiper seal.

EU-214S: One (1) 3,248,243-gallon, gasoline storage tank equipped with an internal floating roof (originally an external floating roof now covered with a geodesic dome which, as a system, acts as an internal floating roof) with a liquid mounted primary seal and a secondary wiper seal.

EU-215T: One (1) 2,989,433-gallon, gasoline storage tank equipped with an internal floating roof with a liquid mounted primary seal and a secondary wiper seal.

As mentioned above, Tanks EU-212Q and EU-214S were originally equipped with an external floating roof and then geodesic domes were installed at a later date above the floating roofs. Since the installation of the geodesic domes, the tanks are regulated as being equipped with internal floating roofs.

Applicable Standards for Control of VOC and HAP

A. Each of the four (4) storage tanks are subject to COMAR 26.11.13.03A(1)(a), which requires that each tank's gauging and sampling devices be gas tight except when in use. **[Authority: COMAR 26.11.13.03A(1)(a)]**

B. In accordance with COMAR 26.11.13.03A(1)(b), each of the storage tanks shall be operated with a well maintained internal floating roof equipped with a primary and secondary seal. **[Authority: COMAR 26.11.13.03A(1)(b)]**

C. Each of the four (4) storage tanks are subject to COMAR 26.11.13.03A(2), which requires the Permittee to meet the following seal requirements:

   1. There shall be no visible holes, tears, or other openings in the seal or seal fabric. **[Authority: COMAR 26.11.13.03A(2)(a)]**

   2. Each seal shall be intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall. **[Authority: COMAR 26.11.13.03A(2)(b)]**

3. The accumulated area of the gaps between the secondary seal and the tank wall and between the seal and other obstructions inside the tank (that is, ladder, roof supports) that are greater than $^{1}/_{8}$ inch in width may not exceed 1.0 square inch per foot of tank diameter. **[Authority: COMAR 26.11.13.03A(2)(c)]**

NESHAP Requirements - 40 CFR, Part 63, Subpart BBBBBB

D. The Permittee shall equip each of the four storage vessels with a fixed roof in combination with an internal floating roof meeting the specifications listed in 40 CFR §60.112b(a)(1)(i), §60.112b(a)(1)(ii)(A), §60.112b(a)(1)(ii)(C), and §60.112b(a)(1)(iii). This also satisfies the requirements of COMAR 26.11.13.03A(1)(b). **[Authority: 40 CFR §60.112b(a)(1), §63.11087(a), and Table 1 to 40 CFR, Part 63, Subpart BBBBBB, requirement 2(b)]**

Compliance Demonstration

To comply with the requirements of COMAR 26.11.13.03A(1)(a), the Permittee shall perform an annual visual inspection of each tank's gauging and sampling devices. If a failure of a gauging or sampling device is detected during a required visual inspection, the Permittee shall repair the device or empty and remove the tank from service within 45 days. If a repair cannot be made within 45 days and if the tank cannot be emptied within 45 days, a 30-day extension may be requested from the Department. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the Permittee will take that will assure that the control equipment will be repaired or the tank will be emptied as soon as possible.

Each of the four (4) storage tanks is equipped with an internal floating roof with a primary and secondary seal to comply with the requirements of COMAR 26.11.13.03A(1)(b). To comply with the seal requirements of COMAR 26.11.13.03A(2) and 40 CFR, Part 63, Subpart BBBBBB, the Permittee shall visually inspect the internal floating roof and the seals of each tank prior to filling and refilling the tank with volatile organic liquid, as specified in 40 CFR §60.113b(a)(1). In accordance with 40 CFR §63.11087(c) and 40 CFR §63.11092(e)(1), the Permittee shall also perform an annual visual inspection of the roof and seals of each tank, as specified in COMAR 26.11.13.03A(3) and 40 CFR §60.113b(a)(2). The Permittee is also required to perform an internal inspection of each tank at least every ten (10) years, as specified in 40 CFR §60.113b(a)(4) or when an annual visual inspection shows non-compliance.

To demonstrate compliance with the seal gap requirements of COMAR 26.11.13.03A(2)(c), the Permittee shall use the procedures in COMAR 26.11.13.03A(4) during each internal tank inspection.

In accordance with 40 CFR §63.11087(e), §63.11094(a), and §63.11095(a)(1), in addition to maintaining inspection and repair records for each tank as specified by 40 CFR §60.113b(a)(1), (2), (3), and (4), and COMAR 26.11.13.03A(3), the Permittee shall also maintain the average monthly storage temperature and throughput for each tank as specified in COMAR 26.11.13.03C(3), and records of all repairs or replacements of the seals as specified in COMAR 26.11.13.03C(2). The Permittee is required to furnish a report to the Department within 30 days illustrating any defects in the tanks, including the seals and internal roofs, detected during the required inspections, as well as any repairs made, as required by 40 CFR §60.115b(a)(3) and §60.115b(a)(4).

In accordance with 40 CFR §63.11087(e), 40 CFR §63.11095(a)(1), §63.11095(a)(3), the Permittee is required to submit a semiannual compliance report that includes records of each inspection performed for each of the four (4) storage tanks. The semiannual compliance report shall also include records of any defects in the tanks, including the seals and internal roofs, that are detected during the required inspections, as well as any repairs made as specified by §60.115b(a)(2) and §60.115b(a)(3).

In accordance with 40 CFR §63.11087(c) and 40 CFR §63.11092(e)(1), the Permittee is also required to notify the Department prior to conducting internal inspections to afford the Department the opportunity to have an observer present as specified in 40 CFR §60.113b(a)(5) and COMAR 26.11.13.03A(3)(d).

<u>Rationale for Periodic Monitoring</u>
COMAR 26.11.13 and 40 CFR, Part 63, Subpart BBBBBB outline specific inspection methods and procedures for demonstrating compliance with the roof and seal requirements for each of the four (4) storage tanks. Subpart BBBBBB requires both internal and external inspections periodically (after every fill and refill, every year, and every ten (10) years). In addition, the Department requires annual inspections of each tank's gauging and sampling devices to demonstrate compliance with the gas-tight device requirement. These inspections are thorough so that if there are any defects they should be detected in a timely manner without the release of significant emissions. Subpart BBBBBB requires that any defects noted in the internal and external inspections are reported to the Department. Subpart BBBBBB requires the submission of semiannual compliance reports detailing records of the

required inspections and any noted defects. No additional periodic monitoring is necessary to demonstrate compliance at this time.

Gasoline Storage Tanks – Emission Units EU-213R, EU-217V, and EU-218W

BP maintains three (3) refined petroleum product storage tanks (EU-213R, 217V, and 218W) each equipped with an internal floating roof with primary and secondary seals for the storage of gasoline, distillate fuels, ethanol, or other refined petroleum products. Tanks EU-213R and EU-217V are currently used to store gasoline and Tank EU-218W is currently used to store ethanol.

These three (3) storage tanks are subject to the requirements of 40 CFR, Part 60, Subpart Kb, for volatile organic liquid storage vessels constructed after July 23, 1984. Each tank has a capacity greater than 75 cubic meters (approximately 19,800 gallons) and each tank was constructed or modified after July 23, 1984. These storage tanks are also subject to the requirements of COMAR 26.11.13, Control of Gasoline and Volatile Organic Compound Storage and Handling, and to the requirements of 40 CFR, Part 63, Subpart BBBBBB for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.

In accordance with 40 CFR §63.11087(f), the storage tanks are deemed in compliance with all applicable requirements for storage tanks included in Subpart BBBBBB if the storage tanks comply with the requirements of 40 CFR, Part 60, Subpart Kb. 40 CFR §63.11087(f) requires that the Permittee indicate that the storage tanks are in compliance with Subpart Kb in their Notification of Compliance Status report required under 40 CFR §63.11093(b). BP has satisfied this requirement. Therefore, there are no Subpart BBBBBB requirements included in the Title V – Part 70 Operating Permit for these tanks.

The following is a description of the storage tanks included in Emission Unit Nos. 213R, 217V, and 218W.

EU-213R: One (1) 3,335,066-gallon, gasoline storage tank equipped with a steel pan internal floating roof with a liquid mounted primary seal and a secondary wiper seal. In addition to gasoline, this tank is permitted to store distillate oils and other refined petroleum products. Permit to Construct No. 003-9-0029 was issued on December 5, 1994 for this gasoline storage tank.

EU-217V: One (1) 2,974,134-gallon, gasoline storage tank equipped with an internal floating roof with a liquid mounted primary seal and a secondary wiper seal. This tank was originally constructed for distillate service. Permit to Construct No. 003-9-0029 was issued on November 6, 1998 to modify the tank to include an internal floating roof and primary and secondary seals to allow it

to be used as a swing tank to store gasoline when another tank is taken out of service for cleaning.

EU-218W: One (1) 3,111,005-gallon, ethanol storage tank equipped with an internal floating roof with primary and secondary seals. This tank previously stored refined petroleum product. A permit to construct was issued on February 3, 2006 for the installation of an internal floating roof, equipped with primary and secondary seals, to convert this tank from distillate oil to ethanol storage. The permit prohibits BP from storing any other material besides ethanol in this tank unless BP applies for and obtains a permit to construct from the Department. BP elected to limit storage in EU-218W to ethanol in order to be exempt from the Department's expanded public participation process for the permit to construct.

Applicable Standards for Control of VOC

A. Each of the three (3) storage tanks are subject to COMAR 26.11.13.03A(1)(a), which requires that the tank's gauging and sampling devices to be gas tight except when in use. **[Authority: COMAR 26.11.13.03A(1)(a)]**

B. In accordance with COMAR 26.11.13.03A(1)(b), each of the storage tanks shall be operated with a well maintained internal floating roof equipped with a primary and secondary seal. **[Authority: COMAR 26.11.13.03A(1)(b)]**

C. Each of the three (3) storage tanks are subject to COMAR 26.11.13.03A(2), which requires the Permittee to meet the following seal requirements:

1. There shall be no visible holes, tears, or other openings in the seal or seal fabric. **[Authority: COMAR 26.11.13.03A(2)(a)]**

2. Each seal shall be intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall. **[Authority: COMAR 26.11.13.03A(2)(b)]**

3. The accumulated area of the gaps between the secondary seal and the tank wall and between the seal and other obstructions inside the tank (that is, ladder, roof supports) that are greater than $^{1}/_{8}$ inch in width may not exceed 1.0 square inch per foot of tank diameter. **[Authority: COMAR 26.11.13.03A(2)(c)]**

NSPS Requirements - 40 CFR, Part 60, Subpart Kb

D. Each of the three (3) storage tanks are subject to the requirements of 40 CFR §60.112b(a)(1), which requires the Permittee to equip each storage vessel with a fixed roof in combination with an internal floating roof meeting the specifications listed in 40 CFR §60.112b(a)(1)(i) through (ix). This also satisfies the requirements of COMAR 26.11.13.03A(1)(b) and 26.11.13.03A(2).

Compliance Demonstration

To comply with the requirements of COMAR 26.11.13.03A(1)(a), the Permittee shall perform an annual visual inspection of each tank's gauging and sampling devices. If a failure of a gauging or sampling device is detected during a required visual inspection, the Permittee shall repair the device or empty and remove the tank from service within 45 days. If a repair cannot be made within 45 days and if the tank cannot be emptied within 45 days, a 30-day extension may be requested from the Department. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the Permittee will take that will assure that the device will be repaired or the tank will be emptied as soon as possible.

Each of the three (3) storage tanks is equipped with an internal floating roof with a primary and secondary seal to comply with the requirements of COMAR 26.11.13.03A(1)(b) and 40 CFR, Part 60, Subpart Kb. To comply with the seal requirements of COMAR 26.11.13.03A(2) and Subpart Kb, the Permittee shall visually inspect the internal floating roof and the seals of each tank prior to filling and refilling the tank with volatile organic liquid, as specified in 40 CFR §60.113b(a)(1). The Permittee shall also perform an annual visual inspection of the roof and seals of each tank, as specified in COMAR 26.11.13.03A(3) and 40 CFR §60.113b(a)(2). The Permittee is also required to perform an internal inspection of each tank at least every ten (10) years, as specified in 40 CFR §60.113b(a)(4) or when an annual visual inspection shows non-compliance.

To demonstrate compliance with the seal gap requirements of COMAR 26.11.13.03A(2)(c), the Permittee shall use the procedures in COMAR 26.11.13.03A(4) during each internal tank inspection. The Permittee shall maintain all records of the inspections and repairs for at least five (5) years and shall make the records available to the Department upon request.

In addition to maintaining inspection and repair records for each tank as specified in 40 CFR §60.113b(a)(1), (2), (3), and (4), and COMAR

26.11.13.03A(3), the Permittee shall also maintain storage tank specification records as specified in 40 CFR §60.116b(a) and (b); records of the materials stored including the maximum true vapor pressure as specified in 40 CFR §60.116b(c); and the average monthly storage temperature and throughput for each tank as specified in COMAR 26.11.13.03C(3). The Permittee is required to furnish a report to the Department within 30 days illustrating any defects in the tanks including the seals and internal roofs detected during the required inspections as well as any repairs made as required by 40 CFR §60.115b(a)(3) and §60.115b(a)(4). The Permittee is also required to notify the Department prior to conducting internal inspections to afford the Department the opportunity to have an observer present as specified in 40 CFR §60.113b(a)(5) and COMAR 26.11.13.03A(3)(d).

Rationale for Periodic Monitoring Strategy
COMAR 26.11.13 and 40 CFR, Part 60, Subpart Kb outline specific inspection methods and procedures for demonstrating compliance with the roof and seal requirements for each of the three (3) storage tanks. Subpart Kb requires both internal and external inspections periodically (after every fill and refill, every year, and every ten (10) years). In addition, the Department requires annual inspections of each tank's gauging and sampling devices to demonstrate compliance with the gas-tight device requirement. These inspections are thorough so that if there are any defects they should be detected in a timely manner without the release of significant emissions. Subpart Kb requires that any defects noted in the internal and external inspections are reported to the Department. No additional periodic monitoring is necessary to demonstrate compliance at this time.

Operational Requirement
The Permittee shall not store gasoline in Tank EU-218W unless the Permittee applies for and obtains a permit to construct from the Department. **[Authority: ARMA Permit to Construct No. 003-9-0029 issued February 3, 2006]**

Compliance Demonstration and Rationale for Periodic Monitoring Strategy
BP elected to limit storage to ethanol only in storage tank EU-218W in order to be exempt from the Department's expanded public participation process for the Permit to Construct issued on February 3, 2006. The Permittee is already required to keep records of the materials stored in storage tank EU-218W to comply with the requirements of 40 CFR 60, Subpart Kb. These records are sufficient to demonstrate compliance with the ethanol storage limitation. No additional periodic monitoring is required.

Storage Tanks – Emission Units EU-10, EU-11, EU-15, EU-16, EU-17, EU-23, and EU-26

These tanks are not exempt from permit requirements in accordance with COMAR 26.11.02.10Q(8) because these tanks are each greater than 2,000-gallons. These tanks are sources of VOC emissions but are not subject to the large storage tank VOC RACT requirements for VOC storage tanks in COMAR 26.11.13 because the tanks are less than 40,000 gallons and they are not subject to the small gasoline tank VOC RACT requirements in COMAR 26.11.13 because the tanks do not store pure gasoline. These tanks are also not subject to the requirements of 40 CFR, Part 60, Subpart Kb because these tanks are each less than 19,800 gallons in capacity. The tanks are subject to the general VOC requirements of COMAR 26.11.06.06. The following is a description of these storage tanks.

EU-10: One (1) 8,000-gallon, fuel additive, horizontal storage tank.
EU-11: One (1) 8,000-gallon, fuel additive, horizontal storage tank.
EU-15: One (1) 10,000-gallon, fuel additive, horizontal storage tank.
EU-16: One (1) 10,000-gallon, fuel additive, horizontal storage tank.
EU-17: One (1) 8,000-gallon, fuel additive, horizontal storage tank.
EU-23: One (1) 4,500-gallon, slop refined ethanol denatured with up to 5% petroleum products, horizontal storage tank.
EU-26: One (1) 4,300-gallon, fuel additive, horizontal storage tank.

Applicable Standards for Control of VOC

COMAR 26.11.06.06B(1)(a), which requires that the Permittee limit emissions of VOC to not more than 200 pounds per day from installations constructed before May 12, 1972, unless VOC emissions are reduced by 85 percent or more overall. This requirement applies to EU-15, EU-16, and EU-17.

COMAR 26.11.06.06B(1)(b), which requires that the Permittee limit emissions of VOC to not more than 20 pounds per day from installations constructed after May 12, 1972, unless VOC emissions are reduced by 85 percent or more overall. This requirement applies to EU-10, EU-11, EU-23, and EU-26.

Operational Requirement

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

Compliance Demonstration and Rationale for Periodic Monitoring Strategy

General maintenance and repair conducted by the Permittee will ensure that these additive and slop refined ethanol storage tanks are in compliance with the VOC requirements of COMAR 26.11.06.06B(1)(a) or COMAR 26.11.06.06B(1)(b). According to the EPA Tanks 4.0.9d emission estimate program, it is estimated that each tank (with the exception of EU-23) emits less than one (1) pound per day per tank. It is estimated that EU-23 emits 7.0 pounds per day (1.3 tons per year). Standard storage tank preventative maintenance will ensure that the emissions from these tanks remain less than the applicable 20 pounds per day or 200 pounds per day.

To continue to comply with the VOC emissions limitations of COMAR 26.11.06.06, the Permittee shall maintain records of the amounts, types, and composition of all materials loaded into each tank. These records can be used to determine VOC emissions from each tank and are sufficient to demonstrate that each tank will not exceed its applicable VOC emissions limitation. In addition, the Permittee shall report incidences of excess emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, “Report of Excess Emissions and Deviations”. The Permittee is required to obtain appropriate approval from the Department if the contents of these storage tanks are changed such that these tanks would become subject to more stringent monitoring, testing, record keeping and reporting requirements. No periodic monitoring is required to demonstrate compliance with the applicable standards listed above.

Five Lane Loading Rack - Emission Unit EU-LR

EU-LR is a five (5) lane refined petroleum product loading rack with a John Zink twin carbon bed VRU used for primary control and a John Zink VCU used for back-up control. The loading rack has five (5) lanes with a total of 25 loading arms. Tank trucks are bottom loaded with gasoline, fuel oil, and diesel fuel. The VRU was installed in 1989 (ARMA Permit to Construct No. 003-9-0029 issued January 4, 1989) and the VCU was installed in 1993 as a back-up control device (ARMA Permit to Construct No. 003-9-0029M issued on July 21, 1993). The VCU operates whenever the VRU is down for repairs. Emissions from the loading rack include fugitive emissions from truck loading and emissions from both the VRU and the VCU. The terminal does not own or operate any of the tank trucks. BP uses dedicated trailers owned and operated by Dana Transport

and Fleet Transit to distribute BP gasoline, as well as non-dedicated trailers owned by a variety of companies.

A permit to construct was issued on October 3, 2011, to modify the existing loading rack to allow blending butane with gasoline products. The following pieces of equipment were installed for blending butane with gasoline products:

- One (1) 60,000-gallon pressurized butane bullet (EU-12).
- One (1) 225-gallon ethanol day tank containing ethanol denatured with up to 5% gasoline.
- One (1) 225-gallon sample return tank containing a mixture of 90% gasoline and 10% denatured ethanol (EU-8).
- New pumps, valves, and flanges at the loading rack to allow for butane to be blended into gasoline product as trucks are filled at the loading rack.

The butane-blended gasoline will be injected in the vicinity of the loading rack as gasoline and ethanol are being loaded into tank trucks. BP is not storing the gasoline/butane mixture in any of the terminal's product storage tanks and is not loading pure butane into trucks. All applicable requirements from the permit to construct are incorporated into the renewed Title V – Part 70 Operating Permit.

Applicable Standards for Visible Emissions Limitation

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

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

Compliance Demonstration (Visible Emissions Limitation)
The VCU is the only emissions source at the facility that may emit visible emissions. To comply with the no visible emissions limitation of COMAR 26.11.06.02C the Permittee shall perform monthly visible emissions observations of the VCU when the VCU is operating for a six (6) minute period. If the VCU does not operate during a month, a record shall be maintained to indicate that no observation was required during that month.

If emissions are visible, the Permittee is required to perform all necessary repairs and continue visible emissions observations until corrective action has achieved compliance with this regulation within 48 hours. After 48 hours, if there are still visible emissions, the

Permittee shall take additional remedial actions and perform a Method 9 observation once daily for 18 minutes until corrective action has achieved compliance. The Permittee is required to maintain a log of all visible emissions observations conducted as well as any corrective actions taken. This requirement is part of the Permittee's CAM Plan (Indicator 4) for the John Zink VCU. If incidents of visible emissions are observed which are not allowed under the exceptions to COMAR visible emission regulations, then the Permittee is required under "Report of Excess Emissions and Deviations" Permit Condition 4, Section III to report the incidents.

Rationale for Periodic Monitoring (Visible Emissions Limitation)
Combustion units rarely have visible emissions. Visible emissions from the VCU would only occur if the unit is malfunctioning. Because the VCU is used as a back-up control device to the VRU and operates when the VRU is off line for maintenance (once a week for 8 hours), monthly visible emissions observations are adequate to ensure that the VCU is operated properly. The exhaust gases from the stack of the unit are continuous and a 6-minute observation when the VCU is operating is satisfactory to determine if visible emissions are occurring. The preventive maintenance required by the CAM Plan will be sufficient to ensure that the unit operates as designed and that the unit will not have visible emissions.

Applicable Standards for Control of VOC and HAP (Vapor Collection and Control Requirements)

1. The vapor collection and control system controlling emissions from the loading system shall collect the total organic compounds (TOC) vapors displaced from cargo tanks during product loading and shall control at least 90 percent of all vapors from the loading racks. **[Authority: 40 CFR §60.502(a), COMAR 26.11.13.04A(1)(a), 40 CFR §63.11088(a), and Table 2 to 40 CFR, Part 63, Subpart BBBBBB, requirement 1(a)]**

2. The emissions from the vapor collection and control system shall be limited to 0.083 pounds of TOC per 1,000 gallons (10 milligrams of TOC per liter) of gasoline or VOC loaded. Note: Compliance with this requirement also demonstrates compliance with the requirements of COMAR 26.11.13.04A(1)(a)(i), 40 CFR §60.502(b), and Table 2 to 40 CFR, Part 63, Subpart BBBBBB, requirement 1(b). **[Authority: COMAR 26.11.03.06C, COMAR 26.11.13.04A(1)(a)(i), 40 CFR §60.502(b), Table 2 to 40 CFR, Part 63, Subpart BBBBBB, requirement 1(b)]**

This emissions limitation is equivalent to the following: VOC emissions from the VRU or the VCU when controlling emissions from the loading rack shall be less than 9 pounds per hour (based on the emission factor of 10 milligrams of TOC per liter when loading 108,000 gallons of gasoline per hour or 0.083 pounds of TOC per 1000 gallons of gasoline or VOC loaded), unless the Permittee demonstrates to the satisfaction of the Department that the modification to the loading rack to allow butane blending is not considered a modification in accordance with the New Source Performance Standards of 40 CFR, Part 60, Subparts A and XX at a higher emission rate. **[Authority: ARMA Permit to Construct No. 003-0309-9-0039 issued October 3, 2011]**

Compliance Demonstration (Vapor Collection and Control Requirements)

To comply with the requirements of COMAR 26.11.13.04A(1)(a), 40 CFR §60.502(a), and Table 2 to 40 CFR, Part 63, Subpart BBBBBB the loading operations are controlled by a VRU equipped with a CEMS as the primary control device and a VCU as back-up control. The Permittee must perform semiannual preventative maintenance on the VRU and operate and maintain the CEMS in accordance with a quality control plan to ensure proper operation as specified in 40 CFR, Part 63, Subpart A. The CEMS is a compliance option under 40 CFR, Part 63, Subpart BBBBBB. To demonstrate continuous compliance with the 10 milligrams per liter of gasoline loaded requirement (which will also demonstrate compliance with the 35 milligrams per liter of gasoline loaded requirement) and the required 90% control efficiency, the Permittee shall conduct performance tests on the VRU and the VCU to determine the mass emission rate at least once every five (5) years as specified by 40 CFR §60.503(a) – (c), COMAR 26.11.13.04A(3)(b), 40 CFR §63.11092(a)(1)(i) and (ii), and 40 CFR §63.11092(a)(2). The Permittee shall submit a test protocol to the Department for review and approval, and shall submit the test results to the Department.

When the VCU is used as the control device for the loading rack, the Permittee shall monitor the VCU for the presence of a pilot flame and operate the VCU in accordance with the monitoring and inspection plan specified in 40 CFR, Part 63, Subpart BBBBBB. The Permittee shall also conduct preventative maintenance at least three (3) times per year on the VCU as specified in the CAM Plan for the VCU. The Permittee is required to operate the VCU within the bounds of the CAM Plan included in Table IV-5 of the Title V – Part 70 Operating permit and within the bounds of the operating parameters established in the last performance test. Operating the vapor processing system beyond the bounds of the determined operating parameters will constitute a

violation unless corrective actions as described in the monitoring and inspection plan are followed.

The Permittee is also required to keep records of all maintenance and repairs performed, including all replacements or additions of components, on the VRU and VCU. The Permittee shall also maintain records of all mass emission rate performance tests and records of all preventative maintenance performed as required by the CAM Plan. Records of the continuous monitoring data required under 40 CFR §63.11092(b) indicating the time intervals during the loadings of gasoline cargo tanks or the operating parameter data during loadings. These records will ensure that the VRU and the VCU are maintained to perform as designed.

The Permittee is required to notify the Department prior to using the VCU as a main control device for purposes other than VRU maintenance when the duration of non-maintenance usage is more than seven (7) consecutive days. The Permittee is to report all deviations from the CAM Plan for the VCU and all malfunctions records for the VRU and VCU to the Department. The Permittee is also required to submit an excess emissions report to the Department as a part of the semiannual compliance report.

<u>Explanation of emissions limitation</u>
In order to maintain synthetic minor status with respect to HAP emissions and to be recognized as a synthetic minor source for the MACT requirements of 40 CFR, Part 63, Subpart R, National Emissions Standards for Gasoline Distribution Facilities, the Permittee has accepted an emission limitation of 10 milligrams of VOC per liter of gasoline loaded which is more stringent than the 35 milligrams per liter requirement included in COMAR 26.11.13.04A(1)(a)(i) and 40 CFR §60.502(b).

The modification to the loading rack to allow butane blending in October of 2011 was not considered a modification with respect to 40 CFR, Part 60, Subpart A and XX because the potential hourly emission rate did not increase as a result of the modification. It was determined when Permit to Construct No. 003-0309-9-0029 was issued on October 3, 2011, that the emission rate before and after a physical or operational change is evaluated by comparing the hourly potential emissions immediately before the change to potential hourly emissions after the change. It was also determined that BP was not subject to the non-attainment NSR requirements because the emissions increase as a result of the modification were estimated as less than 25 tons per year based on the gasoline throughput limitation of 560 million gallons

per year (included in Facility Wide Requirements section below and Table 6 of the Title V – Part 70 Operating Permit) and the conservative emission factor of 10 mg/L of gasoline loaded.

BP demonstrated that their potential hourly emission rate from the loading rack is 8.964 pounds per hour. This emission rate is based on an established conservative emission factor of 10 mg/L of gasoline loaded or 0.083 lbs of VOC emitted per 1,000-gallons of gasoline loaded. BP estimates their present potential emissions based on 10 mg/L even though their actual hourly emissions are much less based on stack testing data and CEMS monitoring.

To demonstrate continuous compliance with the 10 milligrams of VOC per liter of gasoline loaded requirement, the Permittee shall conduct performance tests to determine mass emission rate once every five (5) years and conduct preventative maintenance on the VRU and the VCU.

<u>Rationale for Periodic Monitoring (Vapor Collection and Control Requirements)</u>
The VRU and the VCU are designed to meet all applicable VOC control efficiency and emission limitation requirements. The most recent performance test on the VRU was conducted on October 3, 2013 and the most recent performance test on the VCU was conducted on May 27, 2011. An emission rate of 7.73 mg/liter of gasoline loaded was reported for the VCU and 7.41 mg/liter gasoline loaded was reported for the VRU. The performance test demonstrated that the VOC emissions from the truck loading rack were less than the 10 milligrams per liter of gasoline loaded and the VOC control efficiency of the unit was greater than 99%.

Periodic performance testing, the use of a CEMS, operation of a Terminal Management System, and proper preventative maintenance of the VRU and the VCU will ensure that the units are operated as designed. The use of a CEMS for the VRU is a continuous monitoring strategy and does not require any additional periodic monitoring for compliance with the requirements. The VCU is monitored through a required periodic monitoring and inspection plan and the CAM Plan. Corrective actions are required for excursions from established operating parameters established during the most recent performance tests.

Applicable Standards for Control of VOC and HAP (Vapor Tight Tank Truck Requirements)

The Permittee shall limit the loading of gasoline into gasoline cargo tanks that are vapor tight using the procedures specified in 40 CFR, Part 60, Subpart XX, §60.502(e) through (j). **[Authority: 40 CFR §63.11088(a) and Table 2 to 40 CFR, Part 63, Subpart BBBBBB, requirement 1(d)]**

The Permittee may not allow a gasoline or VOC tank truck to be filled or emptied unless the tank has been certified annually as capable of sustaining a pressure change of not more than three (3) inches of water in five (5) minutes when pressurized to a gauge pressure of 18 inches of water (4,479 kilonewtons/square meter), or evacuated to a gauge pressure of six (6) inches of water (1,493 kilonewtons/square meter) during a test according to the procedure referenced in COMAR 26.11.13.05B(2). The Permittee shall complete any needed repairs, and retest within 15 days of the original test date. **[Authority: 40 CFR §60.502(e) and COMAR 26.11.13.05A and B]**

Compliance Demonstration (Vapor Tight Tank Truck Requirements)

To comply with the gasoline tank truck leak requirements of COMAR 26.11.13.05A and 40 CFR §60.502(e), the Permittee shall ensure that loadings of gasoline or VOC into tank trucks are limited to vapor-tight gasoline tank trucks by obtaining vapor tightness documentation for each gasoline or VOC tank truck that is to be loaded at the facility. The Permittee shall verify that each gasoline tank truck loaded at the facility is a tank truck that has obtained the appropriate vapor tightness documentation within two (2) weeks after the tank truck is loaded. The Permittee shall ensure that a nonvapor-tight tank truck will not be reloaded at the facility until vapor tightness documentation for that tank is obtained.

The Permittee shall keep records of each tank truck's vapor tightness documentation, annual certification testing performed in accordance with 40 CFR §63.11092(f)(1), and documentation of all notifications for non-vapor-tight tank trucks. As an alternative to maintaining records of each gasoline or VOC cargo tank test results at the terminal, the Permittee may have an electronic copy of each record instantly available at the terminal or the Permittee may use a terminal automation system to prevent gasoline or VOC cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system).

The Permittee shall notify the owner or operator of each non-vapor-tight gasoline or VOC tank truck loaded at the facility within one (1) week of the documentation cross-check or three (3) weeks after the loading has occurred and shall submit to the Department copies of

certification test records from the leak-tight conditions tests required under COMAR 26.11.13.04A(3)(a). The Permittee is also required to submit to the Department semiannual compliance reports that include each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained.

Rationale for Periodic Monitoring (Vapor Tight Tank Truck Requirements)

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

BP has installed an interlock system, which prevents drivers with expired vapor certifications from loading until the terminal has received updated certification. The Permittee notified the Department in a letter dated January 22, 2004 that tank truck tightness documentation will be maintained at a central location in accordance with 40 CFR §60.505(e).

Applicable Standards for Control of VOC and HAP (Back Pressure and Leak Requirements)

The vapor collection and control system and the liquid loading equipment shall be operated such that:

1. The exhaust gases from the loading rack shall vent through the VRU or the VCU prior to discharging to the atmosphere. **[Authority: COMAR 26.11.03.06C]**

2. The gauge pressure in the delivery tank shall not exceed 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR §60.503(d). **[Authority: 40 CFR §60.502(h) and §60.503(d)]**

3. No pressure-vacuum vent in the bulk gasoline terminal's vapor collection and control system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water). **[Authority: 40 CFR §60.502(i)]**

4. During loading, the gasoline or VOC tank truck pressure does not exceed 18 inches of water, and vacuum does not exceed 6 inches of water. **[Authority: COMAR 26.11.13.04A(1)(b)(i)]**

5. There are no gasoline or VOC leaks in the system when tested by the method referenced in COMAR 26.11.13.04A(3)(a) during loading or unloading operations. **[Authority: COMAR 26.11.13.04A(1)(b)(ii)]**

Compliance Demonstration (Back Pressure and Leak Requirements)

To comply with the requirements of COMAR 26.11.13.04A(1)(b)(i) and (ii), 40 CFR §60.502(h), and 40 CFR §60.502(i) the Permittee shall conduct monthly checks on the back pressure and shall conduct monthly leak inspections of all components related to the loading rack operations during the loading of tank trucks as specified in the CAM Plan (Indicator 1 and 2) for the VCU and 40 CFR §60.502(j) for the VRU and the VCU. The Permittee shall conduct testing for leak-tight conditions as specified by COMAR 26.11.13.04A(3)(a).

The Permittee is required to perform monthly leak inspections of all equipment in gasoline service as specified in 40 CFR §63.11089(a). The Permittee shall also record all equipment in gasoline service inspected and any leaks discovered in a log book. The Permittee is required to repair the leak within specified time frames and shall provide in the semiannual report specified in 40 CFR §63.11095(b), the reason why a repair was not feasible and the date a repair was made. The number of equipment leaks not repaired within 15 days after detection is required to be included in the semiannual compliance report which is submitted with the semiannual monitoring report. The Permittee shall also maintain monthly records of the back pressure readings in the vapor collection system during the loading of tank trucks during a period of maximum product flow. The Permittee shall maintain these records for at least five (5) years as required by the CAM Plan and shall report all deviations from the CAM Plan requirements with the semiannual monitoring report.

Rationale for Periodic Monitoring (Back Pressure and Leak Requirements)

The VRU, VCU, and the loading rack are designed to meet the applicable pressure requirements. In addition, the VRU, VCU, and the loading rack are designed to be leak-tight during loading. Monthly back pressure and leak checks during loading are sufficient to demonstrate compliance with the requirements. All equipment in gasoline service is required to be identified and all equipment leaks are to be documented and repaired within a specified time frame. If leaks are not repaired within 15 days, the Department is notified.

Applicable Standards for Control of VOC and HAP (Design and Operational Requirements)

1. The vapor collection system shall prevent any total organic compound vapors collected at one loading rack from passing to another loading rack or lane to the atmosphere. **[Authority: 40 CFR §60.502(d), 40 CFR §63.11088(a), and Table 2 to 40 CFR, Part 63, Subpart BBBBBB, requirement 1(c)]**

2. The Permittee shall assure that loadings of gasoline or VOC tank trucks are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system. **[Authority: 40 CFR §60.502(f)]**

3. The Permittee shall assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline or VOC tank truck. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks. **[Authority: 40 CFR §60.502(g)]**

4. The Permittee shall maintain a top submerged or bottom loading system on the terminal's loading racks. **[Authority: COMAR 26.11.13.04A(1)(c)]**

Compliance Demonstration and Rationale for Periodic Monitoring (Design and Operational Requirements)
The VRU, the VCU, and the loading rack are designed to meet the requirements of 40 CFR §60.502(d), (f), and (g), 40 CFR §63.11088(a), Table 2 to 40 CFR, Part 63, Subpart BBBBBB, requirement 1(c), and COMAR 26.11.13.04A(1)(c). Even though BP has already demonstrated compliance with the design standards at the time of construction, BP shall operate the system such that the terminal remains in compliance with these standards. Because compliance with these requirements has already been demonstrated there are no monitoring, testing, record keeping, or reporting requirements associated with these standards.

Operational Limitations

The Permittee shall only load ethanol from the fifth lane of the loading rack unless prior approval is obtained from the Department to load other materials. **[Authority: ARMA Permit to Construct No. 003-0309-9-0029 issued on October 3, 2011]**

Compliance Demonstration and Rationale for Periodic Monitoring (Operational Limitations)
BP was issued a permit to construct on April 11, 2006 to modify their existing loading rack with the addition of one (1) ethanol truck loading area (the fifth lane). BP elected to limit the loading to only include ethanol and to exclude any other materials in order to be exempt from the Department's expanded public participation process. BP is required to maintain records of the types and amounts of materials loaded in the four (4) lanes of the loading rack loading gasoline and distillate products, and the fifth lane of the loading rack loading only ethanol. Requiring BP to maintain monthly records of the types and amounts of materials loaded at the loading rack is sufficient to ensure that only ethanol is loaded in the fifth lane.

Overview of the CAM Plan
The loading rack at BP uses a John Zink VRU equipped with a continuous emission monitoring system (CEMS) for primary control and a John Zink VCU as back-up control to meet the applicable federally enforceable emission limits of COMAR 26.11.13.04A(1)(a) and 40 CFR §60.502(a) and (b). The VOC emissions from the loading rack, pre-control, would be greater than the major source threshold of 25 tons per year. The loading rack is not subject to major source MACT requirements and is not otherwise exempt from CAM. A CAM plan is not required for the VRU because the use of a CEMS satisfies the requirements of 40 CFR, Part 64. A CAM plan is required for the VCU and is included in Table IV-5 CAM Plan of the Title V – Part 70 Operating Permit renewal.

Both the VRU and the VCU currently meet the permitted emissions limit of 10 milligrams of VOC vented per liter of gasoline loaded at the loading rack. The VCU is checked weekly and used when the primary unit, the VRU, is shutdown for either malfunction or maintenance.

The performance indicators were selected to ensure a reasonable level of assurance that the emissions of VOC from the loading of gasoline and other petroleum products at the truck loading rack will comply with the emissions limitation of 10 milligrams per liter of gasoline loaded. During the compliance tests to demonstrate compliance with the VOC emissions limits, the vapor

collection system is checked for leaks and back pressure. The Permittee performs preventative maintenance as recommended by the vendor on the VCU, and routine maintenance of the vapor collection system to ensure that the VCU and the vapor collection system continue to perform as designed.

Rationale for Selection of Performance Indicators in the CAM Plan

1. Indicator No. 1 - Vapor Line Back Pressure
   The terminal operations maintenance personnel will conduct monthly checks of the back pressure in the collection system. An excursion is defined as when the pressure gauge indicates 18" of water or greater and truck loading is still occurring. Excessive backpressure can cause relief valves to discharge and increase fugitive emissions from leaks in the collection system.

2. Indicator No. 2 - Equipment leaks
   Terminal operations personnel trained on the procedures to detect, record, and initiate corrective actions shall conduct a monthly leak check of the entire vapor collection system during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. Leaks of gasoline and gasoline vapors are readily detected by a person by use of sight, sound, and smell. This requirement included in the CAM Plan also satisfies the requirement of 40 CFR §60.502(j) of Standards of Performance for Bulk Gasoline Terminals, Subpart XX. This will document that the vapor collection system is free of leaks as it was during the compliance tests.

3. Indicator No. 3 - Presence of a flame within the stack of the VCU
   The pilot detector continuously monitors for the presence of a flame. If the pilot light is present, the combustors will ignite and combustion will occur. Unless a pilot flame is detected, vapors cannot be introduced into the VCU. If no pilot flame is detected, the VCU cannot start-up. Detection of flame failure during operation will shut down the VCU and will automatically shutdown the loading operations. The pilot detector is connected to an interlock system that ensures that the VCU and the loading rack cannot operate if no flame is detected. In addition, preventative maintenance is performed three times a year to ensure that the VCU continues to operate as designed.

4. Indicator No. 4 – Visible emissions observations of the exhaust gases from the VCU stack
   Visible emissions observations will be conducted monthly to detect visible emissions just above the exhaust outlet of the VCU. The observers shall be trained on procedures in making an observation, shall be trained on procedures necessary for record keeping

requirements, and shall be familiar with the maintenance and operation of the VCU. The dampers on air assist blowers are set in a manner that the gasoline vapors will combust smoke-free. Any visible emissions will indicate that the damper settings have malfunctioned.

The following tables contain the CAM Plan for the VCU that is included in Table IV-5 of the renewed Title V – Part 70 Operating Permit.

TABLE IV-5 CAM PLAN
FOR THE VAPOR COMBUSTION UNIT (VCU)

Part 64 Requirement	**CAM Plan**
Vapor Combustor - VCU	**Indicator No. 1**
I. Indicator 64.4(a)(1)	Vapor Line Back Pressure
Monitoring Approach	Pressure Gauge
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion is defined as anytime the pressure gauge indicates greater than 18” of water and truck loading is still occurring. All pressure gauge readings greater than 18” water column shall be reported to the MDE in the required semi-annual monitoring report.
III. Performance Criteria 64.4(a)(3)	
A. Data Representativeness	The back pressure is monitored using a portable pressure gauge which is placed on the vapor hose connection to the tanker truck.
B. Verification of Operational Status	Monthly visual check on each loading bay with manual log entry.
C. AQ/QC Practices and Criteria	Preventative maintenance is performed on the back pressure gauge three times per year. The back pressure gauge is calibrated or replaced at least once every five (5) years during the VRU performance test.
D. Monitoring Frequency	Monthly
E. Data Collection	Monthly visual reading with manual log entry.
F. Averaging Period	N/A

Part 64 Requirement	**CAM Plan**
Vapor Combustor - VCU	**Indicator No. 2**
I. Indicator 64.4(a)(1)	Equipment Leaks
Monitoring Approach	Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline will be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. The detection method will be sight, sound, or smell.
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion is defined as detection of a leak by sight, sound, or smell. An excursion will trigger an investigation, corrective action, and a reporting requirement. Leaks will be repaired within 15 days. All excursions and corrective actions taken shall be reported to the MDE in semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representativeness	The terminal operations personnel will be trained on the procedures to detect, record, and initiate corrective actions.
B. Verification of Operational Status	N/A
C. QA/QC Practices and Criteria	The operations' personnel responsible for performing the monthly inspections will be trained on the procedures to follow. The terminal will maintain a record of employees trained to perform the inspections.
D. Monitoring Frequency	Monthly
E. Data Collection Procedures	Manual records of inspections, leaks found, and leaks repaired.
F. Averaging Period	N/A

Part 64 Requirement	**CAM Plan**
Vapor Combustor Unit--VCU	**Indicator No. 3**
I. Indicator 64.4(a)(1)	Presence of flame within the VCU stack.
Monitoring Approach	Pilot (flame) detector
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion is defined as a failure for the pilot detector to shutdown the VCU when there is no flame. All excursions shall be reported to the MDE in semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representativeness	The pilot detector controls the operation of the VCU. When no pilot flame is detected, the VCU cannot start-up and if no flame is detected during operation, the VCU automatically shuts down and loading ceases.
B. Verification of Operational Status	The pilot detector is connected to an interlock system that ensures the VCU and loading rack cannot operate if no flame is detected.
C. QA/QC Practices and Criteria	Preventative maintenance is performed on the VCU three times per year. During each visit the following items are checked to ensure proper pilot operation: • Pull and clean pilot gas strainer. • Pull and clean assist gas strainer. • Check all indicator lights and sensors, replace if faulty. • Inspect spark ignition systems. • Ensure burner scanner is operating properly by blocking scanner and starting unit. Unit should shut down upon pilot flame failure. • Complete start-up procedure is checked.

D. Monitoring Frequency	Pilot detector operates continuously.
E. Data Collection Procedures	Results of inspections and preventative maintenance of the pilot operation are manually recorded and maintained on site.
F. Averaging Period	N/A

Part 64 Requirement	**CAM Plan**
Vapor Combustor Unit - VCU	**Indicator No. 4**
I. Indicator 64.4(a)(1)	Visible emissions observations during loading operation.
Monitoring Approach	Conduct visible emissions observations.
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion occurs if visible emissions observed. All excursions will be reported to the MDE in semi-annual monitoring reports. An excursion will trigger an investigation, corrective action, and a reporting requirement. All excursions shall be reported to the MDE in semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representativeness	The observer looks for visible emissions just above the exhaust outlet of the combustor.
B. Verification of Operational Status	N/A
C. QA/QC Practices and Criteria	The observers are trained on procedures in making an observation and record keeping requirements.
D. Monitoring Frequency	At least once per month, the Permittee shall observe the stack of the VCU for visible emissions. An operator familiar with the maintenance and operation of the VCU shall conduct each observation for a 6 minute period.
E. Data Collection Procedures	Results of observations will be manually recorded and maintained on site. Records will include date, time, and results of the observation.
F. Averaging Period	N/A

Facility Wide Requirements

HAP Emissions Limitations

The major source threshold for HAPs is 10 tons per year for any single HAP or 25 tons per year for a total combination of HAPs. The facility wide HAP emissions limitations cover emissions from the loading and storage of all fuels at the facility. The following limitations are included in the Title V – Part 70 Operating Permit to ensure that the Permittee's total emissions will not exceed the major source thresholds for HAPs and to ensure that the non-attainment NSR requirements do not apply to the October 2011 modification to the loading rack to allow butane blending with gasoline products.

1. Facility wide HAP emissions shall be less than10 tons for any single HAP and 25 tons for the total combination of all HAPs in any consecutive twelve (12) month period. **[Authority: COMAR 26.11.03.06C]**

2. Total gasoline/ethanol throughput shall not exceed 560 million gallons in any consecutive twelve (12) month period and distillate throughput shall not exceed 100 million gallons in any consecutive twelve (12) month period, unless the Permittee demonstrates to the satisfaction of the Department, that non-attainment NSR requirements do not apply to the modification to the loading rack to allow blending butane with gasoline products. **[Authority: ARMA Permit to Construct No. 003-0309-9-0029 issued on October 3, 2011]**

Compliance Demonstration and Rationale for Periodic Monitoring Strategy for Facility Wide Requirements

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

With the phase-out of MTBE in gasoline, the HAP emissions from the terminal have decreased. Facility wide HAP emissions from the BP terminal over the last five years average 0.97 tons per year.

To ensure that non-attainment NSR requirements do not apply to the modification to the loading rack allowing butane blending with gasoline products, BP has accepted the gasoline/ethanol throughput limit of 560 million gallons in any consecutive twelve (12) month period and the distillate throughput limit of 100 million gallons in any consecutive twelve (12) month period. These throughput limitations also ensure that the facility will remain a synthetic minor source for HAP emissions and the facility will be recognized as a synthetic minor source for the MACT requirements of 40 CFR, Part 63, Subpart R, National Emissions Standards for Gasoline Distribution Facilities.

The initial Title V Permit issued March 10, 2000 established a gasoline/ethanol throughput limit of 400 million gallons over any twelve (12) month rolling period, an interface throughput limit of 46.2 million gallons over any twelve (12) month rolling period, and a 10 milligram of VOC per liter of gasoline loaded emission limit at the loading rack to ensure that the facility remained a synthetic minor with respect to the MACT standard.

In the January 28, 2004 Part 70 renewal application, BP requested throughput limits of 600 million gallons of gasoline/ethanol (increase from 400 million gallons in initial Part 70 permit) and 100 million gallons of distillate product in order to maintain synthetic minor status with respect to MACT requirements. Because the terminal had stopped loading gasoline or interface at the marine loading dock and because of the decrease in HAP content in gasoline, BP was allowed an increased throughput without changing the synthetic minor status for the MACT.

The gasoline/ethanol throughput limitation was decreased to 560 million gallons in any consecutive twelve (12) month period in ARMA Permit to Construct No. 003-0309-9-0029 issued on October 3, 2011 to allow blending butane with gasoline at the loading rack. BP requested that the gasoline/ethanol throughput limitation be decreased to ensure that the New Source Review requirements were not triggered when blending butane with gasoline at the loading rack.

In order to ensure that BP remains in compliance with the throughput limitations stated in this operational requirement, BP is required to maintain monthly records to document the total gasoline/ethanol throughput and distillate throughput loaded into tank trucks for each

consecutive twelve (12) month period. If BP exceeds these throughput limitations, BP is required to report incidences of excess emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations".

Applicable Standards for Control of VOC and HAP

The facility is subject to the general equipment leak requirements of 40 CFR §63.11089 included in 40 CFR, Part 63, Subpart BBBBBB, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.

The Permittee shall, at all times, operate and maintain any affected source including associated air pollution control equipment and monitoring equipment subject to the requirements of 40 CFR, Part 63, Subpart BBBBBB, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The Department will determine whether such operation and maintenance procedures are being used based on information available to the Department which may include monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **[Authority: 40 CFR §63.11085(a)]**

Compliance Demonstration

The Permittee is required to perform monthly leak inspections of all equipment in gasoline service in accordance with 40 CFR §63.11089(a), and record in a log book the location of all potential leaks, the required monthly leak inspections, and detections of any leaks. A detailed description for each leak detected is required to be included in the log book. The Permittee is required to repair or replace the leaking equipment within 15 calendar days after detection of each leak. Delay of repair of leaking equipment is allowed if the repair is not feasible within 15 days provided the Permittee reports why the repair is not feasible and the date that each repair was completed. The Permittee must record in the log book for any leak not repaired within 15 days, the expected date of successful repair and the date of the successful leak repair.

BP is also required to maintain records of any malfunction of operation of the process equipment or control equipment at the facility and any corrective actions taken. The records shall also include actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR §63.11085(a).

BP is required to submit an excess emissions report that includes leak information and a semiannual report including the malfunctions that occurred during the reporting period and any corrective actions taken. The semiannual report and excess emissions report are to be submitted with the semiannual

compliance report. The semiannual compliance report shall also include the number of leaks not repaired within 15 days of detection.

Rationale for Periodic Monitoring Strategy
BP is required to log detailed information about leak inspections and any leak detected in a log book and is required to submit information to the Department regarding any equipment malfunction. BP is also required to submit information regarding any excess emissions in a semiannual report. It is unlikely that there will be significant leaks at the facility, but in the event that there is a leak, it is required to be repaired within 15 days unless there is a delay of repair. All leak repairs that are delayed are required to be documented including the successful repair date. No additional periodic monitoring is required to demonstrate compliance with the leak requirements of 40 CFR, Part 63, Subpart BBBBBB.

COMPLIANCE SCHEDULE

BP is currently in compliance with all applicable air quality regulations.

TITLE IV – ACID RAIN

The Acid Rain Program does not apply to BP.

TITLE VI – OZONE DEPLETING SUBSTANCES

BP is not subject to Title VI requirements.

SECTION 112(r) – ACCIDENTAL RELEASE

BP is subject to the requirements of Section 112(r). A Risk Management Plan for BP's butane blending system has been submitted.

PERMIT SHIELD

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

INSIGNIFICANT ACTIVITIES

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

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

The No. 2 fuel oil fired-boiler rated at 0.196 million BTU per hour for office building space heat is subject to the following requirements:

COMAR 26.11.09.05A(2), which establishes that the Permittee may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers.

Exceptions: COMAR 26.11.09.05A(2) does not apply to emissions during load changing, soot blowing, start-up, or adjustments or occasional cleaning of control equipment if:

(a) The visible emissions are not greater than 40 percent opacity; and

(b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty minute period.

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

EU-20: One (1) 550-gallon heating oil, horizontal storage tank.
EU-207L: One (1) 691,812-gallon distillate storage tank equipped with a cone roof.

(3) No. 1 Storage of motor vehicle gasoline and having individual tank capacities of 2,000 gallons (7.6 cubic meters) or less;

EU-8: one (1) 225-gallon sample return tank associated with the butane blending project. Note: this emission unit was previously a 300-gallon, fuel additive, horizontal storage tank which was replaced by a square storage tank in 2011.

(4) No. 8 The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less;

EU-7: One (1) 300-gallon, fuel additive, horizontal storage tank.
EU-9: One (1) 2,000-gallon, fuel additive, horizontal storage tank.
EU-13: One (1) 2,000-gallon, slop refined petroleum products, horizontal storage tank.
EU-14: One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.
EU-18: One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.
EU-19: One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.
EU-24: One (1) 300-gallon, fuel additive, horizontal storage tank.
EU-25: One (1) 550-gallon, fuel additive, horizontal storage tank.

The Permittee shall maintain records of the monthly throughput of fuel additive stored in EU-9. **[Authority: ARMA Permit to Construct No. 02-9-0599 issued on November 5, 1997]**

(5) No. 1 The storage of butane, propane, or liquefied petroleum, or natural gas.

EU-12: One (1) 60,000-gallon pressurized butane bullet installed in 2011. Note: EU-12 was previously a 12,000-gallon, slop refined petroleum products, horizontal storage tank which was taken out of service in 1999 and demolished in August of 2011.

(6) No. 1 Laboratory fume hoods and vents.

STATE ONLY ENFORCEABLE REQUIREMENTS

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

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

(1) Applicable Regulations:

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

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

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

(2) Record Keeping and Reporting:

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

A. statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid.

<u>OR</u>

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