

**STATEMENT OF BASIS  
ALABAMA BULK TERMINAL COMPANY, LLC  
BLAKELEY ISLAND TERMINAL  
MOBILE, MOBILE COUNTY, ALABAMA  
FACILITY NO. 503-3035**

This proposed Title V Major Source Operating Permit (MSOP) 4<sup>th</sup> renewal is issued under the provisions of ADEM Admin. Code r. 335-3-16. The above named applicant has requested authorization to perform the work or operate the facility shown on the application and drawings, plans and other documents attached hereto or on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of this permit. The current MSOP became effective on January 26, 2018, and is scheduled to expire on October 17, 2021. The renewal application was due to the Air Division by April 17, 2021, and was received on April 7, 2021. With Alabama Bulk Terminal Company, LLC's (ABT) timely and complete application submittal, the terms of the previous permit remain in effect until this renewal has been issued or denied, in accordance with ADEM Admin. Code r. 335-3-16-.12(2)(c).

**Facility Operations**

Alabama Bulk Terminal Company, LLC (ABT) operates a bulk liquid storage and transfer terminal for petroleum, organic, and inorganic products (SIC 5171) located in Mobile, Mobile County. The facility receives, stores, and distributes these products via barge, ship, and tank truck.

Significant sources of air pollutants at this facility include:

- **Emission Unit Nos. 001, 006, and 009:** three internal floating roof (IFR) storage tanks [Tank Nos. 1, 6, and 9];
- **Emission Unit Nos. 002-005:** four fixed roof storage tanks [Tank Nos. 2-5];
- **Emission Unit Nos. 008 and 010:** two external floating roof (EFR) storage tanks [Tank Nos. 8 and 10];
- **Emission Unit No. 011:** one 25.0 MMBtu/hr boiler used to provide steam heat to Tank Nos. 1, 2, 4, and 6;
- **Emission Unit Nos. 012 and 013:** one 6.895 MMBtu/hr oil heater and one 10.5 MMBtu/hr oil heater used to provide heat to Tank Nos. 3, 5, 8, and 10;
- **Emission Unit No. 014:** one truck loading rack;
- **Emission Unit No. 015:** one marine loading dock;
- **Emission Unit No. 017:** one 454 hp reciprocating internal combustion engine (RICE) natural gas-fired 4-stroke, rich-burn emergency generator;
- **Emission Unit No. 018:** one 80 hp diesel-fired RICE that powers an air compressor; and
- **Emission Unit No. 020:** one 282 hp diesel-fired RICE emergency fire water pump.

The insignificant emission sources at this facility include one portable 300 gallon diesel storage tank for fueling facility equipment; one stationary 360 gallon diesel storage tank for the fire water pump fuel; one 591 gallon thermal oil storage tank; one 571 gallon thermal oil storage tank; one 17,766 gallon diesel storage tank for the stand-by fuel for the boiler; one 5,040 gallon diesel storage tank for the stand-by fuel for the oil heaters and one 1,785 gallon thermal oil storage tank.

### **Applicability: Federal Regulations**

#### **Title V**

This facility is considered a major source under Title V regulations because the potential emissions for sulfur dioxide (SO<sub>2</sub>) and volatile organic compounds (VOC) exceed the 100 TPY major source threshold. As a result of a July 2015 permitting action, ABT is considered a synthetic minor source of HAP emissions because the facility-wide potential emissions from individual HAPs (benzene, ethyl benzene, hexane, toluene, xylenes, methanol, etc.) are limited to less than 9.5 TPY and the total HAPs potential emissions are limited to less than 24.5 TPY.

#### **Prevention of Significant Deterioration (PSD)**

This facility is located in an attainment area for all criteria pollutants. The facility operations are one of the listed [ADEM Admin Code r. 335-3-16-.01(q)2.(xxii)] major source categories (total petroleum storage capacity exceeds 300,000 barrels); therefore, the applicable major source threshold is 100 TPY for criteria pollutants. ABT is a major source under PSD because the potential emissions for both SO<sub>2</sub> and VOC exceed the 100 TPY major source threshold. Although the facility is a major source for SO<sub>2</sub>, multiple units are still subject to previously established synthetic minor limits for SO<sub>2</sub>. The 10.5 MMBtu/hr oil heater (Emission Unit No. 013) and the 6.895 MMBtu/hr oil heater (Emission Unit No. 012) are limited to a maximum allowable sulfur content of 0.79% by weight for the fuel oil burned in each unit. Both of these units burn natural gas as their primary fuel, but can burn fuel oil as a backup fuel. The 10.5 MMBtu/hr oil heater is also limited by the amount of fuel oil that can be burned in this unit (675,910 gallons during any consecutive 12-month period) because the sulfur content limitation alone would not reduce its potential SO<sub>2</sub> emissions below the applicable significant emission rate (40 TPY).

#### **New Source Performance Standards (NSPS)**

##### **Storage Tanks**

To determine the applicability of an NSPS standard, the installation date and/or the modification/reconstruction date (for each tank) was considered. For the modification/reconstruction of a storage tank, the installation of a floating roof is considered an addition of a control device that would reduce emissions; therefore, it would meet the modification exemption provided in 40 CFR §60.14(e)(5). However, in an August 19, 2003, EPA Applicability Determination, it was concluded that if a change in storage materials is coupled with a change in storage tank design which makes the storage tank capable of accommodating the new storage materials, and there is an increase in emissions (on an hourly basis, i.e. lb/hr), the change in storage tank design would then be considered a modification triggering the applicability of an NSPS standard for the relevant time period in which the change occurred.

Therefore, the following evaluations are based on the date of construction and the date each tank was retrofitted with an IFR (if applicable) to determine NSPS applicability:

- Tank No. 6 is subject to 40 CFR Part 60, Subpart K, the Standards of Performance for Storage Vessels for Petroleum Liquids because it was constructed in December 1974, after June 11, 1973, and prior to May 19, 1978, the applicability dates for Subpart K [Adopted by reference in ADEM Admin. Code r. 335-3-10-.02(9)]. This tank has an internal floating roof, which complies with the applicable equipment standard [40 CFR §60.112(a)(1)] for tanks storing products with a true vapor pressure  $\geq 1.5$  psia, but  $\leq 11.1$  psia.
- Tank Nos. 8, 9, and 10 are each subject to 40 CFR Part 60, Subpart Ka, the 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 [Adopted by reference in ADEM Admin. Code r. 335-3-10-.02(9)(a)]. Tank Nos. 8 and 10 are EFR tanks. Each is equipped with a metallic shoe primary seal and rim-mounted secondary seal which complies with the applicable VOC emission standard [40 CFR §60.112a(a)] for tanks storing products with a true vapor pressure  $\geq 1.5$  psia, but  $\leq 11.1$  psia. 40 CFR §60.112a(a) also prescribes the acceptable accumulated area of gaps in the seals and the acceptable width of any individual gap in the seals. Tank No. 9 is an IFR tank. This tank has an internal floating roof, which complies with the applicable equipment standard [40 CFR §60.112(a)(1)] for tanks storing products with a true vapor pressure  $\geq 1.5$  psia, but  $\leq 11.1$  psia.
- According to the permit applications submitted by ABT, Tank Nos. 1-5 were installed before the respective applicability dates for Subpart K, Ka, or Kb.
- It should also be noted that Tank Nos. 1 and 6, were originally constructed as fixed roof tanks and retrofitted with IFRs in April 2001 and March 2000, respectively. These changes were also coupled with a request to store a more volatile product in each tank. In the Statement of Basis, dated November 23, 2011, for the renewal of the facility's Title V MSOP, the Air Division determined that the retrofit did not meet the definition of reconstruction because the cost of adding the IFRs was less than 50% of the cost to replace the tanks. Also, it was determined that the retrofit did not meet the criteria for a modification because installing an IFR is considered the addition of a control device. Although ABT intended to store liquids with higher volatility in these tanks at the time of the retrofit, the calculations provided by ABT demonstrated that there would be a decrease in emissions. As a result, the addition of the IFRs on Tank Nos. 1 and 6 did not trigger 40 CFR Part 60, Subpart Kb applicability.

## Engines

### 80 hp John Deere CI diesel-fired air compressor RICE

40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE) [Adopted by reference in ADEM Admin. Code r. 335-3-10-.02(87)] applies to owners/operators of stationary CI ICE that commence construction after July 11, 2005, and are manufactured after April 1, 2006 [40 CFR §60.4200(a)(2)(ii)]. The 80 hp diesel-fired air compressor engine (Emission Unit No. 018) was manufactured and installed in 1996, prior to the construction and manufacture applicability dates specified in 40 CFR Part 60, Subpart IIII. Therefore, this engine is not subject to Subpart IIII.

### 282 hp John Deere Co./Clarke CI diesel-fired emergency fire pump RICE

The 282 hp diesel-fired emergency fire pump engine (Emission Unit No. 020) is subject to 40 CFR Part 60, Subpart IIII, the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines because the engine was ordered (commenced construction) in July 2012 and was manufactured in August 2012, after the applicability dates for fire pump engines specified in Subpart IIII. The following are the applicable requirements specified in Subpart IIII for the 282 hp emergency fire pump engine:

#### *Emission Standards*

In accordance with 40 CFR §60.4205(c), owners and operators of fire pump engines with a displacement of <30 liters per cylinder must comply with the emission standards for all pollutants specified in Table 4 of Subpart IIII [NMHC+NO<sub>x</sub> = 4.0 g/KW-hr (3.0 g/hp-hr), CO = 3.5 g/KW-hr (2.6 g/hp-hr), and PM = 0.20 g/KW-hr (0.15 g/hp-hr)]. The fire pump engine is certified by the manufacturer to meet the applicable emission standards of Subpart IIII.

#### *Fuel Requirements*

40 CFR §60.4207(b) requires compression ignition internal combustion engines to utilize diesel fuel with a sulfur content of ≤15 ppm and a Cetane index ≥40 or aromatic content ≤35% by volume.

#### *Compliance Requirements*

In accordance with 40 CFR §60.4211(a)(1)-(3), ABT is required to operate and maintain the fire pump engine and control devices (if applicable) according to the manufacturer's emission-related written instructions, change only those emission-related settings that are permitted by the manufacturer, and meet the applicable requirements of 40 CFR Parts 89, 94, and/or 1068. ABT meets the requirements specified in 40 CFR §60.4211(c) because the engine is certified to meet the applicable emission standards and was installed and configured according to the manufacturer's specification.

If this engine is not installed, configured, operated, and maintained according to the manufacturer's emission-related instructions, or the emission-related settings are changed in a way that is not permitted by the manufacturer, ABT shall demonstrate compliance with Subpart IIII according the requirements specified in 40 CFR §60.4211(g)(2).

In addition, this engine is limited by 40 CFR §60.4211(f)(1) through (3) to operating during:

- Emergency situations;
- Maintenance checks and readiness testing, not to exceed 100 hours per year; and
- Non-emergency situations, not to exceed 50 hours per year (those 50 hours are counted towards the 100 hours per year provided for maintenance and testing).

ABT is required to maintain records of the date, time, duration, and purpose of operation each time the engine is operated. To demonstrate compliance with the fuel limitations, ABT is required to maintain records of the sulfur content and either the Cetane index or aromatic content of the diesel fuel that is



burned in the engine. All records shall be maintained in a form suitable for inspection and shall be retained for a period of two years from the date of generation.

#### 454 hp Generac (SG300) SI natural gas-fired 4SRB emergency RICE

The 454 hp natural gas-fired emergency generator (Emission Unit No. 17) was manufactured in December 2008, prior to the January 1, 2009, manufacture applicability date for emergency engines specified in 40 CFR Part 60, Subpart JJJJ, the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (40 CFR §60.4230(a)(4)(iv)) [Adopted by reference in ADEM Admin. Code r. 335-3-10-.02(88)]. Therefore, the emergency generator is not subject to the requirements in Subpart JJJJ. However, ABT will be required to maintain records of the hours of operation for this unit to ensure that the engine continues to meet the definition of an emergency unit. If the status of the engine should change from an emergency unit to a non-emergency unit, then this engine would become subject to the requirements of Subpart JJJJ.

#### Boiler/Oil Heaters

The 25.0 MMBtu/hr York Shipley boiler (installed in 1973) and the 10.5 MMBtu/hr Hopkins Volcanic oil heater (installed in 1981) are not subject to 40 CFR Part 60, Subpart D<sub>c</sub> because they were installed prior to the June 9, 1989, applicability date for Subpart D<sub>c</sub> [Adopted by reference in ADEM Admin. Code r. 335-3-10-.02(2)(c)]. The 6.895 MMBtu/hr oil heater was installed in 2005 but is not subject to Subpart D<sub>c</sub> due its size (<10 MMBtu/hr).

#### MACT

Although the facility was reclassified as a synthetic minor source of HAP emissions, the facility would remain subject to 40 CFR Part 63, Subpart EEEE, the National Emission Standards for Hazardous Air Pollutants for Organic Liquids Distribution (Non-Gasoline) [Adopted by reference in ADEM Admin. Code r. 335-3-11-.06(82)] because it was considered a major source of HAP emissions after the February 5, 2007, compliance date specified in Subpart EEEE. The facility has storage tanks, equipment leak components, and a truck loading rack that could potentially handle organic liquids as defined in 40 CFR §63.2406.

According to ABT's Notification of Compliance dated July 30, 2007, and the information provided in previous permit applications, the facility only operated tanks and equipment leak components that were affected sources under Subpart EEEE. However, ABT indicated in the current renewal application that the facility could potentially load organic liquids through the truck transfer rack into transport vessels; therefore, the truck transfer rack would be considered an affected source under Subpart EEEE. Although the facility meets the loading volume criterion (>800,000 gallons but <10 million gallons) specified in Table 2 (No. 7) of Subpart EEEE, the truck transfer rack would not be subject to any control requirements because the HAP content of the organic liquid being loaded would not meet the organic HAP criterion for control (at least 98% by weight) specified in Table 2. If, at a later date, the HAP content of the organic liquid meets the organic HAP criteria, ABT shall immediately comply with the applicable requirements specified in 40 CFR §63.2346(b) and Table 2 of Subpart EEEE.

ABT's specific requirements under Subpart EEEE are discussed in the emission testing and monitoring section as well as the recordkeeping and reporting section of this analysis.

Although this facility was reclassified as a synthetic minor source of HAP emissions, the facility would remain subject to 40 CFR Part 63, Subpart Y, the National Emission Standards for Marine Tank Vessel Loading Operations [Adopted by reference in ADEM Admin. Code r. 335-3-11-.06(24)] because it was considered a major source of HAP emissions after the compliance date specified in Subpart Y. This Subpart establishes both maximum achievable control technology (MACT) and reasonably available control technology (RACT) standards for this type of operation. The MACT requirements applicable to ABT under Subpart Y are dependent upon which source definition it meets. Because ABT's marine loading dock was in operation before September 20, 1999, the applicability date specified in Subpart Y, and because the annual HAP emissions for the marine loading operation have not exceeded 10 TPY individually or 25 TPY total, ABT meets the definition of an existing source with emissions less than 10 or 25 TPY. According to 40 CFR §63.560(a)(2), existing sources with emissions less than 10 or 25 TPY are not subject to the emission standards specified in 40 CFR §63.562(b) and (d). Furthermore, 40 CFR §63.560(a)(3) specifies that existing sources with emissions less than 10 TPY or 25 TPY are only subject to the recordkeeping requirements of 40 CFR §63.567(j)(4) and the emission estimation requirements of 40 CFR §63.565(l). Additionally, 40 CFR §63.560(a)(4) requires existing sources with less than 10 or 25 TPY to meet the submerged fill standards specified in 46 CFR §153.282. According to the permit applications submitted by ABT, all loading at the marine rack is performed using 95% submerged fill pipe; therefore meeting the requirement of 46 CFR §153.282.

The RACT requirements applicable to ABT under Subpart Y are also dependent upon which source definition it meets. ABT meets the definition of a source with throughput less than 10M barrels of gasoline or 200M barrels of crude oil. According to 40 CFR §63.560(b)(2), sources with throughput less than 10M barrels of gasoline and 200M barrels of crude oil are not subject to the emission standards in 40 CFR §63.562(c) and (d).

### **Engines**

ABT has three reciprocating internal combustion engines (RICE) that are considered affected sources under 40 CFR Part 63, Subpart ZZZZ, the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. The 282 hp diesel-fired emergency fire pump (Emission Unit No. 020) and the 454 hp natural gas-fired, 4-stroke rich burn emergency generator (Emission Unit No. 017) are each considered new sources because they were installed after June 12, 2006, the applicability date for new sources. According to 40 CFR §63.6590(c), a new or reconstructed stationary RICE located at an area source must meet the requirements of Subpart ZZZZ by meeting the requirements of 40 CFR Part 60, Subpart IIII for CI engines or 40 CFR Part 60, Subpart JJJJ for SI engines. No further requirements would apply to the fire pump engine and the emergency generator under Subpart ZZZZ.

The 80 hp diesel-fired air compressor engine (Emission Unit No. 018) is considered an existing affected source located at an area source under Subpart ZZZZ because the engine was constructed before the June 12, 2006, applicability date. According to 40 CFR §63.6603(a), this unit would be subject to the following work practice requirements specified in Table 2d of Subpart ZZZZ:

- Change the oil and filter every 1,000 hours of operation or annually, whichever comes first;
- Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and

- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

### **Boiler/Heaters**

Because the facility was reclassified as a synthetic minor source of HAP emissions prior to the January 31, 2016, compliance date of 40 CFR Part 63, Subpart DDDDD, the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters at Major Sources [Adopted by reference in ADEM Admin. Code r. 335-3-11-.06(107)], the 25.0 MMBtu/hr York Shipley boiler, the 10.5 MMBtu/hr Hopkins Volcanic oil heater, and the 6.895 MMBtu/hr oil heater would not be considered affected sources under Subpart DDDDD. Additionally, these units would not be considered affected sources under 40 CFR Part 63, Subpart JJJJJ, the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers at Area Sources, because they would only burn natural gas as their primary fuel.

### **Applicability: State Regulations**

### **Engines**

Although the 282 hp diesel-fired emergency fire pump engine, the 80 hp diesel-fired air compressor engine, and the 454 hp natural gas-fired emergency generator at this facility are fuel combustion sources, they are not subject to any particulate matter (as TSP) emission limitation of ADEM Admin. Code Chap. 335-3-4 or any sulfur dioxide (SO<sub>2</sub>) emission limitation of ADEM Admin. Code Chap. 335-3-5 because they do not meet the definition of fuel burning equipment nor is this facility considered one of the process industries, general or specific. The engines are, however, subject to the visible emissions standards of ADEM Admin. Code r. 335-3-4-.01(1), which states that no air emission source may emit particulate of an opacity greater than 20% (as measured by a six-minute average) more than once during any 60-minute period and at no time shall emit particulate of an opacity greater than 40% (as measured by a six-minute average). The engines are expected to be able to comply with this standard because they are fired exclusively with diesel fuel or natural gas.

### **Boiler and Oil Heaters**

The boiler and oil heaters are subject to the State particulate (as TSP) standard (ADEM Admin. Code r. 335-3-4-.03) and the State SO<sub>2</sub> standard [ADEM Admin. Code r. 335-3-5-.01(1)] for fuel burning equipment. These units are also subject to the visible emissions standards of ADEM Admin. Code r. 335-3-4-.01(1).

### **Storage Tanks**

Tank No. 1 is subject to the requirements of ADEM Admin. Code r. 335-3-6-.03 because the tank stores a VOC product with a TVP  $\geq 1.5$  psia. This tank complies with this standard because it is equipped with an IFR and is limited to the storage of products with a TVP  $< 11.0$  psia. Tank Nos. 2-5 are not subject to ADEM Admin. Code r. 335-3-6-.03 because the product stored in these tanks have a TVP  $< 1.5$  psia under storage conditions. Because these tanks are not equipped with a vapor recovery system, floating roof, or any other approved control device, they are limited to storing products with a TVP  $< 1.5$  psia.

Tank Nos. 6, 8, 9, and 10, are subject to the requirements of ADEM Admin. Code r. 335-3-6-.03 because the tanks store products with a TVP  $\geq 1.5$  psia. However, the State emission standard is superseded by the emission standards of 40 CFR Part 60, Subpart K and Subpart Ka, in accordance with ADEM Admin. Code r. 335-3-10-.01(2) because the federal standard is more stringent.

Based upon the exception for sources with potential VOC emissions less than 100 TPY specified in ADEM Admin. Code r. 335-3-6-.01(1)(b), Tank Nos. 1-6 and 9 are not subject to the requirements specified in ADEM Admin. Code r. 335-3-6-.04 and Tank Nos. 8 and 10 are not subject to ADEM Admin. Code r. 335-3-6-.23. This exception is based on the potential emissions of each tank rather than the facility-wide potential emissions.

### **Loading Racks**

The marine loading dock is not subject to ADEM Admin. Code r. 335-3-6-.03(3), "Loading and Storage of VOC," because this regulation only applies to loading VOC products into tank trucks and trailers.

The truck loading rack is subject to ADEM Admin. Code r. 335-3-6-.03 when loading products with a TVP  $\geq 1.5$  psia which requires the facility be equipped with a vapor collection system, to use a 95% submerged fill loading system, or to load product from the bottom. The truck loading rack achieves compliance with this regulation by using a bottom-fill loading system.

The truck and marine loading operations are subject to ADEM Admin. Code r. 335-3-6-.09 which requires all pumps and compressors employed in handling VOC materials in Mobile County to have mechanical seals or other equipment of equal efficiency.

## **Emission Testing and Periodic Monitoring**

### **Storage Tanks**

There are no applicable testing requirements for Tank No. 6. The monitoring requirements are discussed in the recordkeeping and reporting requirements section of this analysis. For Tank Nos. 8 and 10, as specified in 40 CFR Part 60, Subpart Ka, §60.113a, an annual seal gap test is required for the secondary seal and a quinquennial<sup>1</sup> seal gap test is required for the primary seal. ABT is also required to notify the Air Division at least 30 days prior to conducting the required seal gap tests. Because Tank No. 9 is equipped with an IFR, there are no applicable testing requirements. Additional monitoring requirements for Tank Nos. 8, 9, and 10 are discussed in the recordkeeping and reporting requirements section of this analysis.

As referenced in 40 CFR §63.2346(a)(3) and in Tables 2 and 4 of Subpart EEEE, ABT demonstrates compliance with Subpart EEEE for the storage tanks 8, 9, and 10 by complying with the level 2 control requirements of 40 CFR Part 63, Subpart WW. 40 CFR §63.1063 specifies the floating roof design, operational, inspection, and repair requirements. ABT shall comply with the following inspection requirements specified in 40 CFR §63.1063(c):

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<sup>1</sup> Once every five years

- For IFR tanks, 40 CFR §63.1063(c)(1)(i)(A) specifies that tanks shall be inspected at least once per year in accordance with the inspection procedure requirements specified in 40 CFR §63.1063(d)(2).
- For IFR tanks, 40 CFR §63.1063(c)(1)(i)(B) specifies that each time a tank is completely emptied or degassed, or every 10 years, whichever occurs first, the IFR shall be inspected in accordance with the inspection procedure requirements specified in 40 CFR §63.1063(d)(1).
- For EFR tanks, 40 CFR §63.1063(c)(2)(ii) specifies that the primary seal shall be inspected every 5 years and the secondary seal shall be inspected annually.
- For EFR tanks, 40 CFR §63.1063(c)(2)(iii) requires ABT to inspect the tank each time the storage vessel is emptied and degassed, or every 10 years, whichever occurs first. The inspection shall be conducted in accordance with the inspection procedure requirements specified in 40 CFR §63.1063(d)(1).

### **Truck Transfer Rack**

Because the truck transfer rack is not subject to the control criteria specified in Table 2 of Subpart EEEE, there are no applicable testing requirements. The monitoring requirements are discussed in the recordkeeping and reporting section of this analysis.

### **Equipment Leaks**

As referenced in 40 CFR §63.2346(c), ABT demonstrates compliance with Subpart EEEE for each pump, valve, and sampling connection that operates in organic liquid service for at least 300 hours per year by complying with the leak detection and repair (LDAR) requirements specified in either 40 CFR Part 63, Subpart TT, Subpart UU, or Subpart H. ABT monitors these components in accordance with the following leak detection and repair requirements specified in Subpart TT for LDAR compliance. *(Note: The two types of liquids specified in Subpart TT are light liquid service and heavy liquid service. The monitoring descriptions provided would satisfy the requirements of this Subpart for both types of liquids):*

- 40 CFR §63.1003 requires ABT to identify all equipment subject to Subpart TT. The equipment would not necessarily be required to be physically tagged, but could be identified on a site plan, in log entries, or by other appropriate methods. For special equipment designated as unsafe-to-monitor (equipment under extreme pressure or heat), ABT is required to identify the equipment and establish a planned schedule for monitoring the equipment. For special equipment designated as difficult-to-monitor, ABT is required to identify the equipment, establish a planned schedule for monitoring the equipment, and provide an explanation as to why the equipment is difficult-to-monitor.
- 40 CFR §63.1005 requires ABT to conduct a leak repair no later than 15 calendar days after a leak is detected. Exceptions to this timeline are allowed, but only under certain circumstances specified in 40 CFR §63.1005(c) and (d). A first attempt at repair should be conducted no later than 5 calendar days after the leak is detected.
- For valves in gas and vapor service and light liquid service, 40 CFR §63.1006 specifies that valves shall be monitored monthly using the methods described in 40 CFR §63.1004(b) and (c) to detect

leaks. Any valve for which a leak is not detected for two successive months may be monitored the same month (first, second, or third month) every quarter, beginning with the next quarter, until a leak is detected. If a leak is detected, the valve shall be monitored monthly until a leak is not detected for two successive months. However, in a previous renewal application, ABT had indicated the facility intends to utilize alternatives for compliance monitoring in accordance with the skip period alternatives specified in 40 CFR §63.1006(b)(6). This would allow ABT to reduce the monitoring frequency to once per year after five consecutive quarters of monitoring for affected valves provided that the percent of leaking valves remains equal to or less than 2.0%.

- For pumps in light liquid service, 40 CFR §63.1007 requires ABT to monitor the pumps monthly to detect leaks using the method specified in 40 CFR §63.1004(b) and visually inspect the pumps each calendar week for indications of liquid dripping from the pump seal. If a liquid is observed dripping from a pump seal, a leak is detected. The repair should be made in accordance with the procedures in 40 CFR §63.1005 and should result in no visual indications of any liquid dripping from the pump.

There are no testing requirements applicable to Tank Nos. 1, 2, 3, 4, and 5 under Subpart Ka and Subpart EEEE. ABT is required to monitor compliance with the vapor pressure limits applicable to each tank. These requirements are discussed in the recordkeeping and reporting requirements section of this analysis.

### **Boiler and Oil Heaters**

Because the boiler and oil heaters burn natural gas as their primary fuel and diesel fuel as their secondary fuel, they would be expected to comply with the applicable State TSP and SO<sub>2</sub> allowable emission rates, as well as the visible emission standards. Therefore, no emission testing would be required for the boiler and heaters.

### **Engines**

There are no testing requirements applicable to the 282 hp emergency fire pump engine, the 80 hp air compressor engine, or the 454 hp emergency generator.

## **Recordkeeping and Reporting**

*Note: In accordance with ADEM Admin. Code r. 335-3-16-.05(c)2.(ii), all required records shall be maintained in a permanent form suitable for inspection for a period of 5 years from the date of generation of each record and be made available upon request.*

### **Facility-wide Requirements**

ABT is required to record the monthly throughput and the maximum vapor pressures of each product handled at this facility. In addition, ABT is required to calculate and maintain records of the facility-wide total HAP and individual HAP emissions for each month and for each consecutive 12-month period. ABT is required to notify the Air Division within 10 days of any exceedances of an emission limit, throughput limit, or vapor pressure limit established in the MSOP.

## **Storage Tanks and Loading Racks**

In addition to the facility-wide requirements previously noted, ABT is required to demonstrate compliance with the applicable requirements of 40 CFR Part 60, Subpart K and Subpart Ka for Tank Nos. 6, 8, 9, and 10 by recording and maintaining a record of the petroleum liquid stored, the period of storage, and the maximum TVP of each liquid during the respective storage period. Additionally, ABT is required to notify the Air Division in writing prior to conducting an inspection on Tank Nos. 8, 9, and 10 as required by Subpart WW and Subpart Ka at least 30 days in advance.

When storing organic liquid as defined in 40 CFR §63.2406, ABT is subject to the notification, recordkeeping, and reporting requirements established in Subpart EEEE. Specifically, for emission sources identified in 40 CFR §63.2338 that do not require control under 40 CFR §63.2346(a)-(e), ABT is required by 40 CFR §63.2390(a) to keep all records identified in 40 CFR §63.2343. For each emission source that requires control under Subpart EEEE, ABT is subject to the applicable reporting requirements specified in 40 CFR §63.2386 and Table 11 of Subpart EEEE and the applicable recordkeeping requirements specified in 40 CFR §63.2390(b)(1)-(2) and Table 10 of Subpart EEEE.

To demonstrate compliance with the synthetic minor HAP limits and Subpart Y, ABT is required to maintain records of the facility's annual HAP emissions on a 12-month rolling average basis. In addition, ABT is required to record and maintain records of the facility's actual throughputs by commodity for the marine loading dock. ABT is required to notify the Air Division in writing within 30 days of exceeding the HAP emission threshold or the 10 M/200 M barrel gasoline/crude oil throughput threshold specified in Subpart Y.

## **Boiler and Oil Heaters**

ABT is required to certify on a semiannual basis that only natural gas, or diesel fuel meeting the sulfur limitation, was burned in each unit. For the 10.5 MMBtu/hr oil heater, ABT is required to calculate and maintain records of the fuel usage on a monthly and 12-month rolling total basis.

## **Engines**

ABT is required to demonstrate compliance with the operational limitations of Subpart IIII by recording and maintaining records of the hours of operation of the 282 hp emergency fire water pump engine as recorded through the non-resettable hour meter. In addition, the facility is required to maintain records of the sulfur content and either the Cetane index or aromatic content of the diesel fuel burned in the engine. Subpart ZZZZ requires ABT to maintain records of the operation and maintenance for the 80 hp air compressor engine. These records shall include, at a minimum, the following: the date of each oil and filter change; the dates of each inspection and replacement of the air cleaner, hoses, and belts; and, the date and nature of other emission-related repairs and maintenance performed.

For the 454 hp emergency generator, ABT is required to maintain records of the hours of operation to ensure that the engine continues to meet the definition of an emergency unit. If the status of the engine should change from an emergency unit to a non-emergency unit then this engine would become subject to the requirements of Subpart JJJJ.

### **Compliance Assurance Monitoring (CAM)**

Although there are emission units at the facility that emit greater than 100 TPY of a criteria pollutant, none of these units employ active control devices as defined in the CAM regulations. As such, the facility is not subject to CAM requirements.

### **Environmental Justice**

ADEM utilized the EJSCREEN screening tool to perform an analysis of the area. Please refer to Appendix A.

### **Public Notice**

The renewal of this Title V MSOP would require a 30-day public comment period and a 45-day EPA review period.

### **Recommendation**

Based on the above analysis, I recommend that Alabama Bulk Terminal, LLC's MSOP (503-3035) be renewed with the conditions noted above pending the resolution of any comments received during the 30-day public comment period and the EPA 45-day review period.

*Andrea Escalante*

Andrea Escalante  
Chemical Branch  
Air Division

August 18, 2021  
Date

210 503-3035 097 08-18-2021 T5SOB ALE 4REN



**APPENDIX A**  
**ALABAMA BULK TERMINAL COMPANY, LLC**  
**EJSCREEN REPORTS**

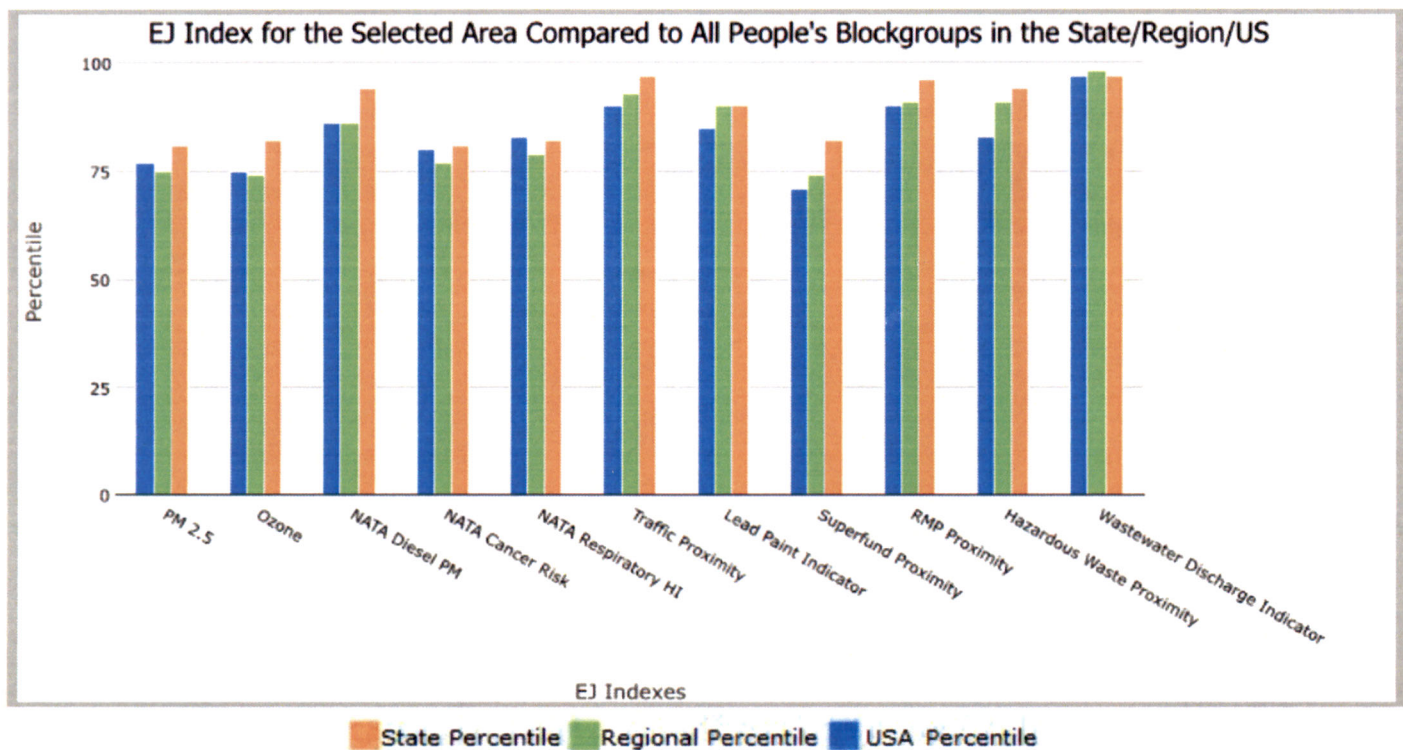
1 mile Ring Centered at 30.696262,-88.032578, ALABAMA, EPA Region 4

Approximate Population: 666

Input Area (sq. miles): 3.14

AL Bulk Terminal Co., LLC

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
<b>EJ Indexes</b>			
EJ Index for PM2.5	81	75	77
EJ Index for Ozone	82	74	75
EJ Index for NATA <sup>*</sup> Diesel PM	94	86	86
EJ Index for NATA <sup>*</sup> Air Toxics Cancer Risk	81	77	80
EJ Index for NATA <sup>*</sup> Respiratory Hazard Index	82	79	83
EJ Index for Traffic Proximity and Volume	97	93	90
EJ Index for Lead Paint Indicator	90	90	85
EJ Index for Superfund Proximity	82	74	71
EJ Index for RMP Proximity	96	91	90
EJ Index for Hazardous Waste Proximity	94	91	83
EJ Index for Wastewater Discharge Indicator	97	98	97



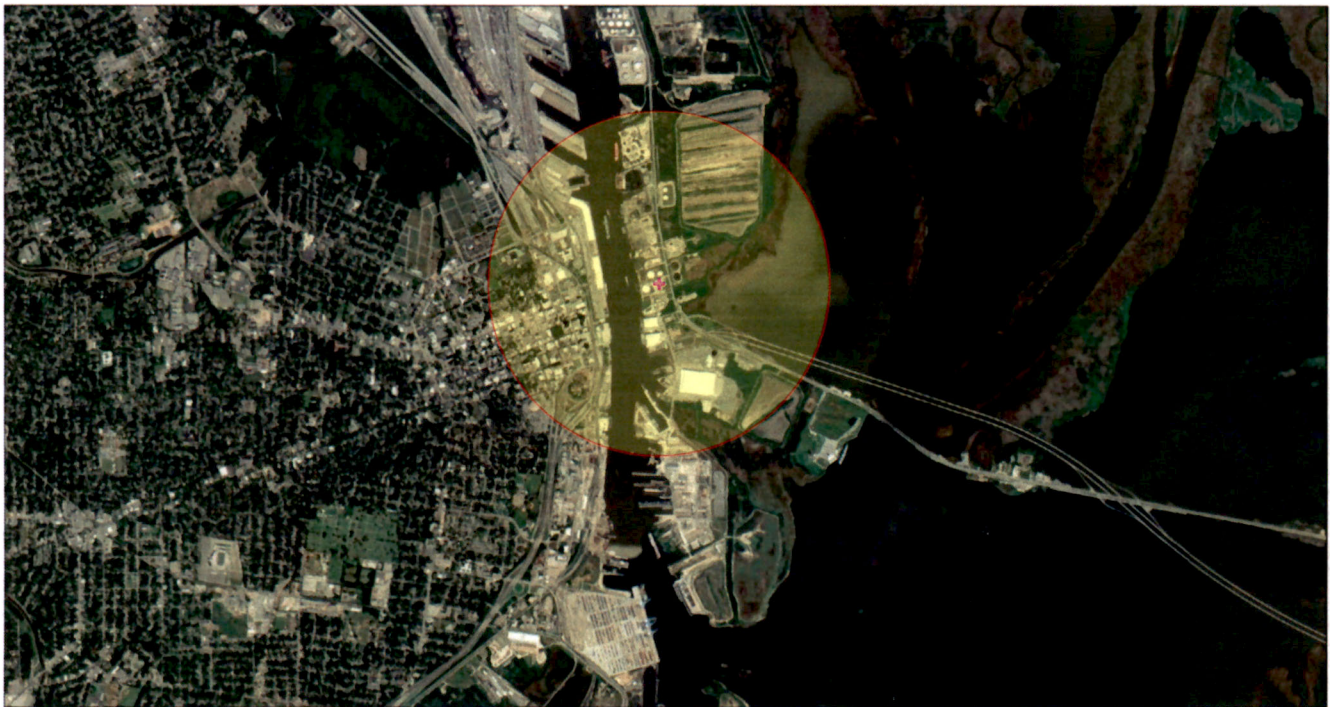
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**1 mile Ring Centered at 30.696262,-88.032578, ALABAMA, EPA Region 4**

**Approximate Population: 666**

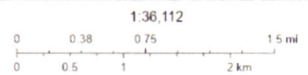
**Input Area (sq. miles): 3.14**

**AL Bulk Terminal Co., LLC**



August 9, 2021

AL Bulk Terminal Co., LLC



Source: Esri, Maxar, GeoEye, Earthstar, Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	1



## EJSCREEN Report (Version 2020)



**1 mile Ring Centered at 30.696262,-88.032578, ALABAMA, EPA Region 4**

**Approximate Population: 666**

**Input Area (sq. miles): 3.14**

**AL Bulk Terminal Co., LLC**

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
<b>Environmental Indicators</b>							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$ )	9.03	9.31	40	8.57	74	8.55	65
Ozone (ppb)	37.1	38	31	38	42	42.9	17
NATA* Diesel PM ( $\mu\text{g}/\text{m}^3$ )	1.14	0.346	99	0.417	95-100th	0.478	95-100th
NATA* Cancer Risk (lifetime risk per million)	43	43	50	36	80-90th	32	90-95th
NATA* Respiratory Hazard Index	0.73	0.65	76	0.52	95-100th	0.44	95-100th
Traffic Proximity and Volume (daily traffic count/distance to road)	1400	220	97	350	95	750	86
Lead Paint Indicator (% Pre-1960 Housing)	0.49	0.18	91	0.15	92	0.28	76
Superfund Proximity (site count/km distance)	0.032	0.054	52	0.083	46	0.13	29
RMP Proximity (facility count/km distance)	1.6	0.41	95	0.6	90	0.74	87
Hazardous Waste Proximity (facility count/km distance)	3.3	0.82	96	0.91	94	5	77
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.16	1.2	91	0.65	94	9.4	90
<b>Demographic Indicators</b>							
Demographic Index	52%	36%	77	37%	74	36%	75
People of Color Population	55%	34%	77	39%	71	39%	69
Low Income Population	48%	38%	69	36%	71	33%	77
Linguistically Isolated Population	4%	1%	90	3%	76	4%	69
Population With Less Than High School Education	13%	14%	52	13%	59	13%	64
Population Under 5 years of age	0%	6%	5	6%	5	6%	4
Population over 64 years of age	28%	16%	94	17%	90	15%	92

\* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: [www.epa.gov/environmentaljustice](http://www.epa.gov/environmentaljustice)

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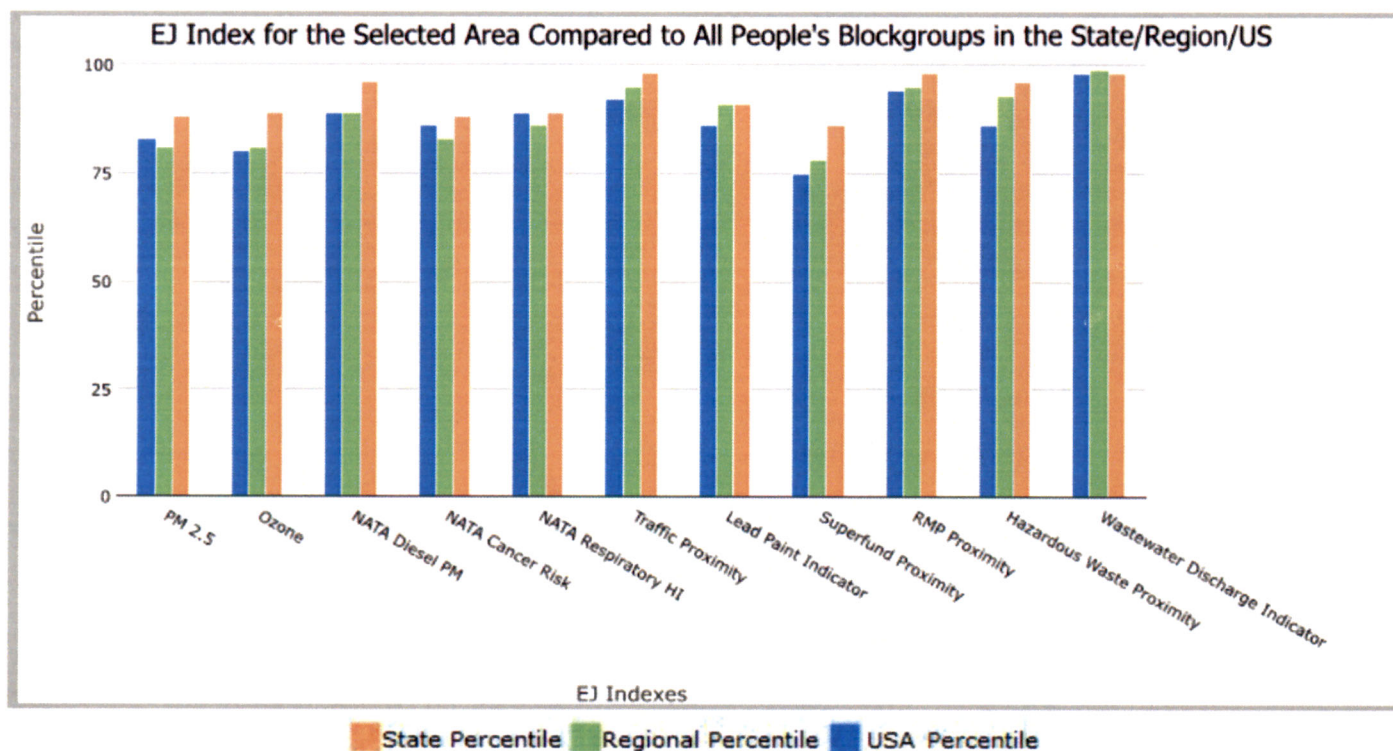
3 miles Ring Centered at 30.696262,-88.032578, ALABAMA, EPA Region 4

Approximate Population: 23,120

Input Area (sq. miles): 28.27

AL Bulk Terminal Co., LLC (The study area contains 1 blockgroup(s) with zero population.)

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
<b>EJ Indexes</b>			
EJ Index for PM2.5	88	81	83
EJ Index for Ozone	89	81	80
EJ Index for NATA* Diesel PM	96	89	89
EJ Index for NATA* Air Toxics Cancer Risk	88	83	86
EJ Index for NATA* Respiratory Hazard Index	89	86	89
EJ Index for Traffic Proximity and Volume	98	95	92
EJ Index for Lead Paint Indicator	91	91	86
EJ Index for Superfund Proximity	86	78	75
EJ Index for RMP Proximity	98	95	94
EJ Index for Hazardous Waste Proximity	96	93	86
EJ Index for Wastewater Discharge Indicator	98	99	98



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.



**3 miles Ring Centered at 30.696262,-88.032578, ALABAMA, EPA Region 4**

**Approximate Population: 23,120**

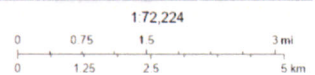
**Input Area (sq. miles): 28.27**

**AL Bulk Terminal Co., LLC (The study area contains 1 blockgroup(s) with zero population.)**



August 9, 2021

✚ AL Bulk Terminal Co., LLC



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

<b>Sites reporting to EPA</b>	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	3



## EJSCREEN Report (Version 2020)



**3 miles Ring Centered at 30.696262, -88.032578, ALABAMA, EPA Region 4**

**Approximate Population: 23,120**

**Input Area (sq. miles): 28.27**

**AL Bulk Terminal Co., LLC (The study area contains 1 blockgroup(s) with zero population.)**

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
<b>Environmental Indicators</b>							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$ )	9.02	9.31	40	8.57	74	8.55	65
Ozone (ppb)	37.1	38	31	38	42	42.9	17
NATA* Diesel PM ( $\mu\text{g}/\text{m}^3$ )	0.956	0.346	98	0.417	95-100th	0.478	90-95th
NATA* Cancer Risk (lifetime risk per million)	43	43	45	36	80-90th	32	90-95th
NATA* Respiratory Hazard Index	0.71	0.65	69	0.52	95-100th	0.44	95-100th
Traffic Proximity and Volume (daily traffic count/distance to road)	1000	220	95	350	91	750	81
Lead Paint Indicator (% Pre-1960 Housing)	0.58	0.18	94	0.15	95	0.28	81
Superfund Proximity (site count/km distance)	0.032	0.054	52	0.083	45	0.13	29
RMP Proximity (facility count/km distance)	1.8	0.41	96	0.6	91	0.74	88
Hazardous Waste Proximity (facility count/km distance)	2.6	0.82	93	0.91	91	5	72
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	1.4	1.2	97	0.65	98	9.4	95
<b>Demographic Indicators</b>							
Demographic Index	63%	36%	85	37%	84	36%	84
People of Color Population	69%	34%	84	39%	80	39%	78
Low Income Population	53%	38%	76	36%	78	33%	82
Linguistically Isolated Population	1%	1%	74	3%	53	4%	47
Population With Less Than High School Education	20%	14%	71	13%	76	13%	78
Population Under 5 years of age	6%	6%	48	6%	50	6%	47
Population over 64 years of age	16%	16%	51	17%	56	15%	60

\* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

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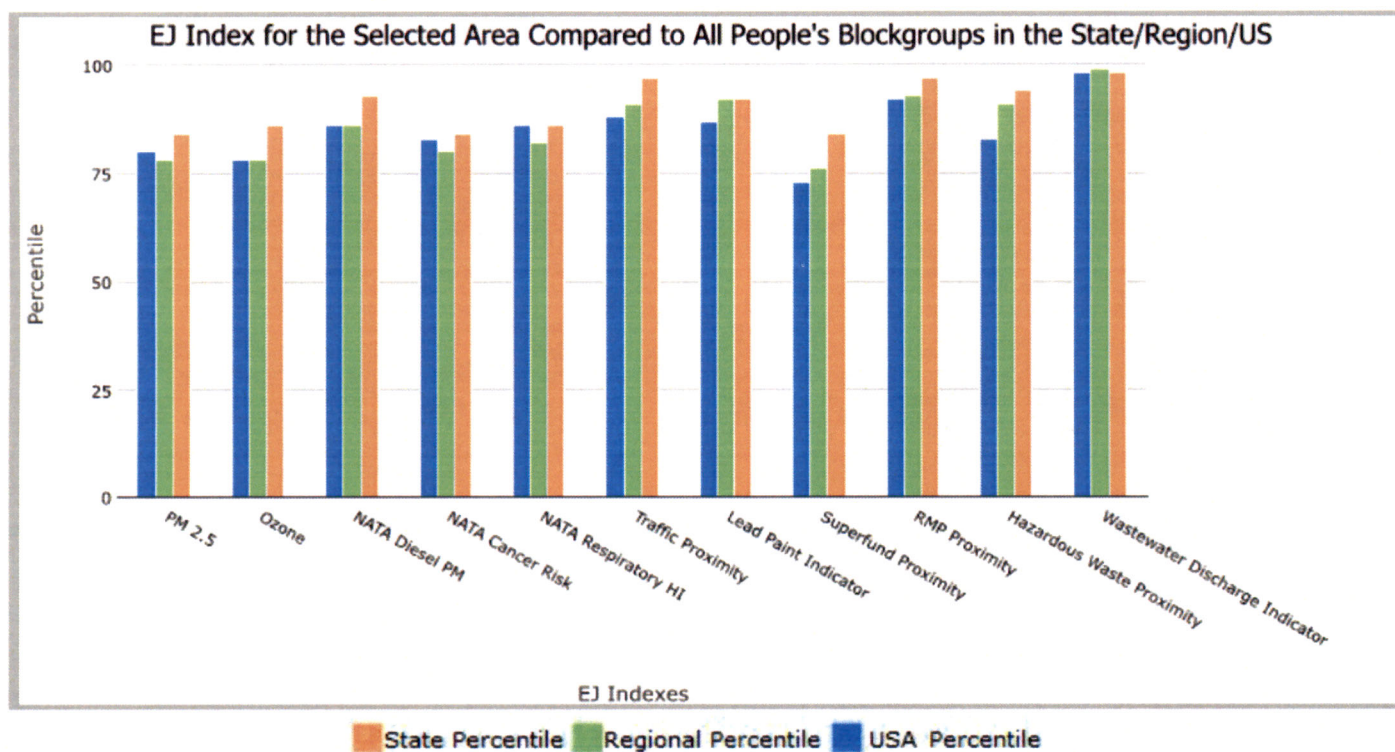
5 miles Ring Centered at 30.696262,-88.032578, ALABAMA, EPA Region 4

Approximate Population: 68,918

Input Area (sq. miles): 78.53

AL Bulk Terminal Co., LLC (The study area contains 2 blockgroup(s) with zero population.)

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
<b>EJ Indexes</b>			
EJ Index for PM2.5	84	78	80
EJ Index for Ozone	86	78	78
EJ Index for NATA <sup>*</sup> Diesel PM	93	86	86
EJ Index for NATA <sup>*</sup> Air Toxics Cancer Risk	84	80	83
EJ Index for NATA <sup>*</sup> Respiratory Hazard Index	86	82	86
EJ Index for Traffic Proximity and Volume	97	91	88
EJ Index for Lead Paint Indicator	92	92	87
EJ Index for Superfund Proximity	84	76	73
EJ Index for RMP Proximity	97	93	92
EJ Index for Hazardous Waste Proximity	94	91	83
EJ Index for Wastewater Discharge Indicator	98	99	98



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

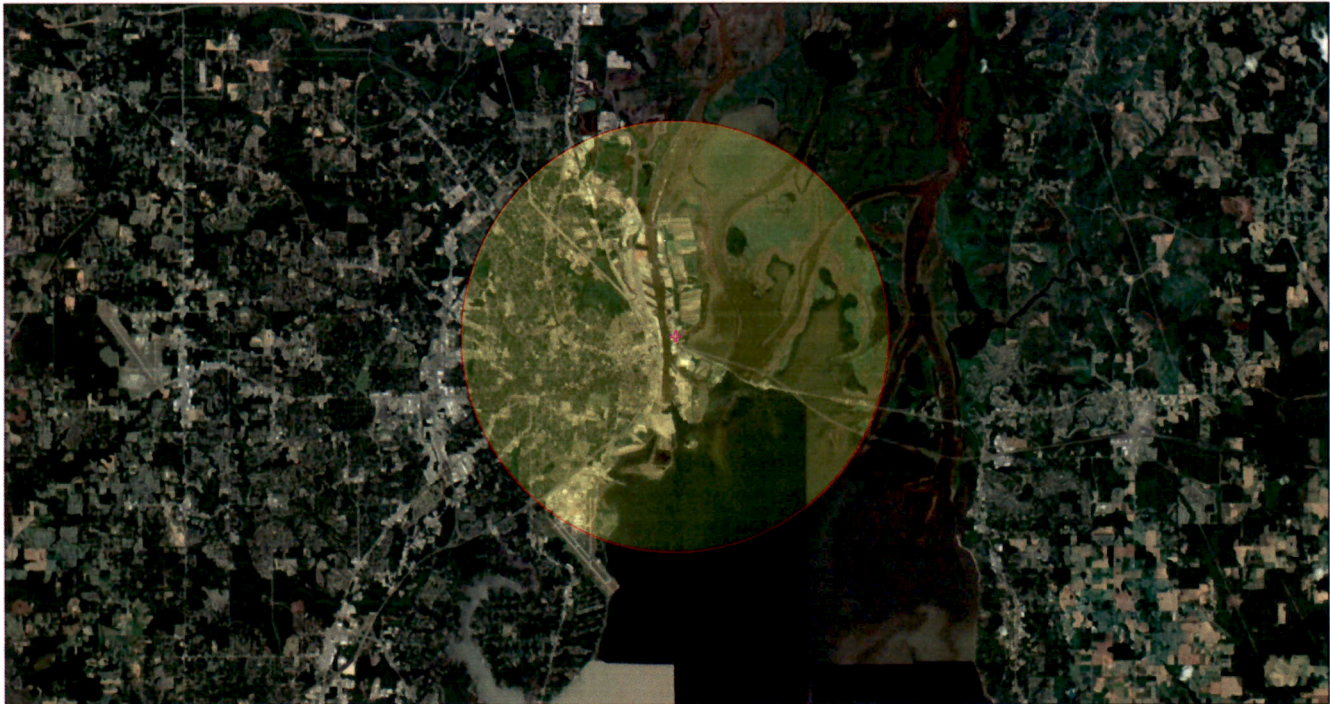


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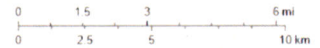
**AL Bulk Terminal Co., LLC (The study area contains 2 blockgroup(s) with zero population.)**



August 9, 2021

✦ AL Bulk Terminal Co., LLC

1:144,448



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

<b>Sites reporting to EPA</b>	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	11



## EJSCREEN Report (Version 2020)



5 miles Ring Centered at 30.696262,-88.032578, ALABAMA, EPA Region 4

Approximate Population: 68,918

Input Area (sq. miles): 78.53

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<b>Environmental Indicators</b>							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$ )	9.02	9.31	39	8.57	74	8.55	65
Ozone (ppb)	37.1	38	30	38	42	42.9	16
NATA* Diesel PM ( $\mu\text{g}/\text{m}^3$ )	0.863	0.346	97	0.417	90-95th	0.478	80-90th
NATA* Cancer Risk (lifetime risk per million)	42	43	43	36	80-90th	32	90-95th
NATA* Respiratory Hazard Index	0.7	0.65	62	0.52	90-95th	0.44	95-100th
Traffic Proximity and Volume (daily traffic count/distance to road)	690	220	92	350	86	750	75
Lead Paint Indicator (% Pre-1960 Housing)	0.57	0.18	93	0.15	94	0.28	81
Superfund Proximity (site count/km distance)	0.032	0.054	53	0.083	46	0.13	29
RMP Proximity (facility count/km distance)	1.9	0.41	96	0.6	92	0.74	89
Hazardous Waste Proximity (facility count/km distance)	2.4	0.82	92	0.91	90	5	70
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	2	1.2	97	0.65	98	9.4	95
<b>Demographic Indicators</b>							
Demographic Index	66%	36%	87	37%	86	36%	87
People of Color Population	76%	34%	86	39%	84	39%	81
Low Income Population	55%	38%	79	36%	81	33%	84
Linguistically Isolated Population	0%	1%	72	3%	52	4%	45
Population With Less Than High School Education	17%	14%	65	13%	71	13%	74
Population Under 5 years of age	6%	6%	57	6%	58	6%	55
Population over 64 years of age	16%	16%	51	17%	56	15%	60

\* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

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