

STATEMENT OF BASIS

Plains Marketing, L.P. – Mobile Terminal Mobile, Mobile County, Alabama Facility/Permit No. 503-3013

This draft Title V Major Source Operating Permit (MSOP) 4th renewal is issued under the provisions of ADEM Admin. Code chap. 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 was originally issued on April 13, 2016, and is scheduled to expire on November 16, 2020. With Plains Marketing, L.P.'s (Plains) timely and complete application submittal, the terms of the current 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

Plains operates a petroleum bulk storage and transfer terminal (SIC 5171) located in Mobile (Mobile County). The terminal has the capability of receiving crude oil, petroleum liquids, and ethanol via ships, barges, tank trucks, or pipeline. The material is stored in one of the existing storage tanks and is loaded out by ships, barges, tank trucks, or pipeline.

The following are the significant sources of air pollutants at this facility:

Emission Unit Nos. 002 - 011: Ten (10) vertical fixed roof storage tanks each equipped with an internal floating roof [Tank Nos. 1101, 1104, 1105, 1110, 1111, 1112, 1116, 62061, 62062, & 62063]

Emission Unit Nos. 012 - 015: Four (4) vertical fixed roof storage tanks each equipped with an internal floating roof [Tank Nos. 1102, 1103, 1108, & 1109]

Emission Unit Nos. 016 - 017: Two (2) vertical fixed roof storage tanks [Tank Nos. 1114 & 1115]

Emission Unit No. 018: Volatile organic materials truck loading

Emission Unit No. 019: Volatile organic materials marine loading operations

Emission Unit No. 020: 250 hp diesel-fired, 4-stroke lean-burn (4SLB) reciprocating internal combustion engine (RICE) that powers an emergency generator

Emission Unit No. 021: 220 hp diesel fired, 4SLB RICE that powers a firewater pump [Firewater Pump #1]

Emission Unit Nos. 022 - 023: Two (2) 265 hp 4SLB RICE that powers a cargo pump [Cargo Pump Nos. 1 & 2]

Emission Unit Nos. 024 - 025: One (1) 111 hp 4SLB RICE that powers a stormwater pump and One (1) 74 hp 4SLB RICE that powers a stormwater pump (Stormwater Pump Nos. 1 & 2]

Emission Unit No. 026: One (1) 154 hp 4SLB RICE that powers a firewater pump [Firewater Pump #2]

Insignificant emission sources at this facility include electric petroleum pumps and organic liquid storage tanks with a storage capacity of less than or equal to 1,000 gallons.

Facility Modifications

The type of primary and secondary seals associated with Tank Nos. 1101, 1102, 1104, 1108, 1110, and 1112 were updated to reflect the type of seals listed in the renewal application. Plains replaced the primary and secondary seals on Tank No. 1111.

Applicability: Federal Regulations

Title V

This facility is considered a major source under Title V regulations because the potential emissions for volatile organic compounds (VOC) exceed the 100 TPY major source threshold. This facility is not considered a major source of hazardous air pollutants (HAP) because the potential emissions of each individual HAP would not exceed 10 TPY, and the potential emissions of combined HAP would not exceed 25 TPY.

New Source Review (NSR)/Prevention of Significant Deterioration (PSD)

This facility is located in an attainment area for all criteria pollutants and the facility operations are one of the 28 listed major source categories (total petroleum storage capacity exceeds 300,000 barrels); therefore, the applicable major source threshold of concern is 100 TPY for criteria pollutants. This facility is considered a major source under PSD regulations because the potential emissions for VOC exceed the 100 TPY major source threshold. Plains holds no PSD permits, but as a result of a 2005 permitting action to avoid PSD permits, Plains has a PSD synthetic crude oil throughput limitation on the truck rack of 2,284,170 gallons during any consecutive 12-month period.

New Source Performance Standards (NSPS)

Storage Tanks

The following is a summary of the storage tanks located at this facility:

EMISSION UNIT NO.	TANK NO.	TANK DESCRIPTION	INSTALL DATE	APPLICABLE REGULATIONS
001	1106	3,360,000 gallon IFRT	1960; IFR installed in 1974	SIP
002	1101	3,360,000 gallon IFRT	1960; IFR installed in 1974	SIP
003	1104	3,360,000 gallon IFRT	1960; IFR installed in 1974	SIP

EMISSION UNIT NO.	TANK NO.	TANK DESCRIPTION	INSTALL DATE	APPLICABLE REGULATIONS
004	1105	3,360,000 gallon IFRT	1960; IFR installed in 1974	SIP
005	1110	6,300,000 gallon IFRT	1961	SIP
006	1111	6,300,000 gallon IFRT	1962	SIP
007	1112	6,300,000 gallon IFRT	1962	SIP
008	1116	6,300,000 gallon IFRT	1961; IFR installed in 1974	SIP
009	62061	5,250,000 gallon IFRT	1971; IFR installed in 1979	SIP
010	62062	5,250,000 gallon IFRT	1971, IFR installed in 1979	SIP
011	62063	6,300,000 gallon IFRT	1971, IFR installed in 1979	SIP
012	1109	6,300,000 gallon IFRT	1961, IFR replaced in 2005	40 CFR Part 60, Subpart Kb
013	1103	3,360,000 gallon IFRT	1965, IFR installed in 2005	40 CFR Part 60, Subpart Kb
014	1102	3,360,000 gallon IFRT	1960, IFR installed in 1998	40 CFR Part 60, Subpart Kb
015	1108	9,450,000 gallon IFRT	1961, IFR installed in 1988	40 CFR Part 60, Subpart Kb
016	1114	420,000 gallon VFRT	1965	SIP
017	1115	420,000 gallon VFRT	1965	SIP

IFRT- internal floating roof tank

VFRT- vertical fixed roof tank

IFR- internal floating roof

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, typically the installation of a floating roof on a storage tank 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 a 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 evaluation was based on the date of construction and the date that the tank was retrofitted with an internal floating roof (if applicable) to determine NSPS applicability for each storage tank:

- Tank Nos. 62061, 62062, and 62063 [EU Nos. 009-011] were initially constructed in 1971 and operated by Citmoco Services, Inc. During that time, the permitting authority for this facility was the Mobile County Board of Health (MCBoH). Because these tanks were storing products with a true vapor pressure (TVP) greater than 1.5 psia, the MCBoH required Citmoco to install control devices on the three tanks. In 1976, Citmoco installed a vapor recovery unit to comply with the request, but was unable to operate the unit consistently. Citmoco notified the MCBoH in September 1978 that the vapor recovery unit was not operating as designed, and in January 1979, the facility requested and received approval to retrofit each tank with an internal floating roof (IFR). The installation of the IFRs was completed in November 1979. Because the installation of the

IFRs meets the modification exemption at 40 CFR §60.14(e)(5), the addition of the IFRs did not trigger 40 CFR Part 60, Subpart Ka applicability.

- Tank Nos. 1102 and 1108 [EU No. 014 and 015] were retrofitted with an IFR in 1998 and 1988, respectively. These changes were coupled with a request to store products with higher volatility in each tank. The calculations provided by Plains during the retrofit process demonstrated that there would be an increase in VOC emissions. Because the addition of the IFRs occurred after the July 23, 1984, applicability date for 40 CFR Part 60, Subpart Kb, and was coupled with a request to store liquids with higher volatility, the modification of each tank triggered Subpart Kb applicability. Tank No. 1102 and Tank No. 1108 are equipped with a mechanical shoe primary seal and a rim-mounted secondary seal. Both tanks comply with the applicable VOC equipment standard specified in 40 CFR §60.112b(a)(1) for tanks storing products with a TVP ≥ 0.75 psia, but < 11.1 psia.
- The IFR associated with Tank No. 1109 [EU No. 12] was replaced in 2005. Because the replacement cost of the IFR exceeded 50% of the total cost of replacing the tank, the replacement of the floating roof constituted reconstruction as defined by 40 CFR §60.15(b); therefore, the reconstruction of Tank No. 1109 triggered the applicability of 40 CFR Part 60, Subpart Kb. Tank No. 1109 is equipped with a mechanical shoe primary seal and a rim-mounted secondary seal which complies with the applicable VOC equipment standard specified in 40 CFR §60.112b(a)(1) for tanks storing products with a TVP ≥ 0.75 psia, but < 11.1 psia.
- Tank No. 1103 [EU No. 013] was modified in 2005 with the addition of an IFR. The modification was coupled with a request to store a product with higher volatility that resulted in an increase in the hourly VOC emission rate. Therefore, the addition of the IFR met the definition of a modification and triggered the applicability of 40 CFR Part 60, Subpart Kb. Tank No. 1103 is equipped with a mechanical shoe primary seal and a rim-mounted secondary seal which complies with the applicable VOC equipment standard specified in 40 CFR §60.112b(a)(1) for tanks storing products with a TVP ≥ 0.75 psia and < 11.1 psia.
- Tank Nos. 1101, 1104, 1105, 1106, and 1116 [EU Nos. 002, 003, 004, 001, and 008] were retrofitted with IFRs in 1974, after June 11, 1973, and prior to May 19, 1978, the applicability dates for 40 CFR Part 60, Subpart K. Because the installations of floating roofs were not coupled with requests to store products with higher volatility in each tank that would cause an increase in emissions, they were not considered modifications that would trigger applicability to Subpart K.
- Tank Nos. 1110, 1111, and 1112 [EU Nos. 005-007] are not subject to 40 CFR Part 60, Subpart K based on the installation date of each tank. At the time of construction these tanks were equipped with IFRs and have not been modified/reconstructed since.
- Tank Nos. 1114 and 1115 [EU Nos. 016 and 017] are fixed roof storage tanks that were constructed in 1965 and have not been modified/reconstructed since. Therefore, these tanks are not subject to 40 CFR Part 60, Subpart K.

Engines

The 250 hp emergency generator, the 154 hp fire water pump engine, and the two (2) stormwater pump engines are considered affected sources under 40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE) because construction of these engines commenced after July 11, 2005, and were manufactured after the applicability dates specified in Subpart IIII.

The following are the applicable requirements specified in Subpart IIII for the 250 hp emergency generator and the 154 hp emergency fire water pump engine:

1. Emission Standards

In accordance with 40 CFR §60.4205(b), owners and operators of 2007 model year and later emergency stationary CI ICE with a displacement of <10 liters per cylinder and a maximum engine power $\leq 3,000$ hp that are not fire pump engines must comply with 40 CFR §60.4202(a)(2) by meeting the certified emission standards for new nonroad CI engines for the same model year and maximum engine power specified in 40 CFR §89.112 and 40 CFR §89.113 for all pollutants. 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. The emergency generator and fire water pump engine are both certified by the manufacturer to meet the applicable emission standards of Subpart IIII.

2. Fuel Requirements

40 CFR §60.4207(b) requires Plains to utilize diesel fuel that meets the following sulfur content criteria specified in 40 CFR §80.510(b) for nonroad diesel:

- Sulfur content ≤ 15 ppm; and
- Cetane index ≥ 40 or aromatic content $\leq 35\%$ by volume.

3. Compliance Requirements

In accordance with 40 CFR §60.4211(a)(1)-(3), Plains is required to operate and maintain the emergency generator, the fire water 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. Plains meets the requirements specified in 40 CFR §60.4211(c) because the engines are certified to meet the applicable emission standards and were installed and configured according to the manufacturer's specification.

If these engines are 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, Plains shall demonstrate compliance with Subpart IIII according the requirements specified in 40 CFR §60.4211(g)(2).

In addition, these engines are limited by 40 CFR §63.4211(f) 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).

The following are the applicable requirements of Subpart IIII for the two (2) stormwater pump engines:

1. Emission Standards

In accordance with 40 CFR §60.4204(b), owners and operators of 2007 model year and later non-emergency stationary CI ICE with a displacement of <10 liters per cylinder and a maximum engine power \leq 3,000 hp must comply with 40 CFR §60.4201(a) by meeting the applicable certified emission standards for new nonroad CI engines for the same model year and maximum engine power specified in 40 CFR §89.112 for Stormwater Pump No. 1 and 40 CFR §1039.102 for Stormwater Pump No. 2. The stormwater pump engines are certified by the manufacturer to meet the applicable emission standards of Subpart IIII.

2. Fuel Requirements

40 CFR §60.4207(b) requires Plains to utilize diesel fuel that meets the following sulfur content criteria specified in 40 CFR §80.510(b) for nonroad diesel:

- Sulfur content \leq 15 ppm; and
- Cetane index \geq 40 or aromatic content \leq 35% by volume.

3. Compliance Requirements

In accordance with 40 CFR §60.4211(a)(1)-(3), Plains is required to operate and maintain the stormwater pump engines 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. Plains meets the requirements specified in 40 CFR §60.4211(c) because the engines are certified by the manufacturer to meet the applicable emission standards and were installed and configured according to the manufacturer's specification.

If these engines are 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, Plains shall demonstrate compliance with Subpart IIII according the requirements specified in 40 CFR §60.4211(g)(1) or (2).

National Emission Standards for Hazardous Air Pollutants (NESHAP)

Storage Tanks and Loading Racks

The Mobile Terminal is an area source that could potentially store gasoline; therefore, the facility is subject to the requirements of 40 CFR Part 63, Subpart BBBBBB, the National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. Plains has one tank (Tank No. 1106) that is subject to the applicable requirements specified in Subpart BBBBBB. According to the permit applications submitted by Plains, the facility no longer stores or anticipates storing gasoline. However, because Plains was considered an affected source after the January 10, 2008, compliance date specified in Subpart BBBBBB, it would remain subject to the applicable requirements of Subpart BBBBBB. Because no truck loading of gasoline occurs at this facility, the truck loading operation would not be subject to the applicable requirements of Subpart BBBBBB. If gasoline is stored in Tank No. 1106, Plains would be required to comply with the requirements outlined in Table 1, option 2(b) of Subpart BBBBBB.

Because Plains is considered a minor source of HAPs, the marine vessel operations are not subject to the maximum achievable control technology standards of 40 CFR Part 63, Subpart Y, the National Emission Standards for Marine Tank Vessel Loading Operations. The reasonable available control technology standards of Subpart Y applicable to Plains are dependent upon which source definition it meets. Plains meets the definition of a source with a throughput less than 10 M barrels of gasoline or 200 M barrels of crude oil. According to 40 CFR §63.560(b)(2), sources with a throughput less than 10 M barrels of gasoline and 200 M barrels of crude oil are not subject to the emission standards in 40 CFR §63.562(c) and (d).

Engines

Any reciprocating internal combustion engine (RICE) is an affected source under 40 CFR Part 63, Subpart ZZZZ, the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. The 250 hp diesel-fired emergency generator, the two stormwater pump engines, and the 154 hp emergency fire water pump are considered new sources because they were installed after June 12, 2006, the applicability date for new sources. According to 40 CFR §63.6590(c), any new compression ignition (CI) stationary RICE located at an area source of HAP emissions must meet the requirements of Subpart ZZZZ by meeting the requirements of 40 CFR Part 60, Subpart III. No further requirements apply to these engines under Subpart ZZZZ.

The 220 hp diesel-fired emergency fire water pump and the two 265 hp diesel-fired cargo pumps are considered existing sources under Subpart ZZZZ because the engines were constructed before the June 12, 2006, applicability date. As an existing CI stationary RICE less than 500 hp located at an area source of HAP emissions, these engines are subject to the work practice requirements specified in 40 CFR §63.6640(a) and Table 2d of Subpart ZZZZ, which include:

220 hp Emergency Fire Water Pump Engine:

- change oil and filter every 500 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.

In addition to the work practice requirements, the emergency fire water pump engine is limited by 40 CFR §63.6640(f) 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).

Also, 40 CFR §63.6625(f) requires the installation of a non-resettable hour meter on the emergency fire water pump engine if one has not been installed.

Two (2) 265 hp Cargo Pumps:

- change 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.

Applicability: State Regulations

Tank Nos. 1101, 1104, 1105, 1106, 1108, 1109, 1110, 1111, 1112, 1116, 62061, 62062, and 62063 meet the applicability criteria for loading and storage of VOCs specified in ADEM Admin. Code r. 335-3-6-.03. These tanks comply with this standard by the use of an internal floating roof which limits these tanks to the storage of materials with a TVP <11.0 psia. Because Tank Nos. 1102, 1103, 1108, 1109 are subject to 40 CFR Part 60, Subpart Kb, which is more stringent, the State VOC emission standard is superseded by the emission standard of Subpart Kb. Tank Nos. 1114 and 1115 are restricted by a previously established permit condition to the storage of a product with a vapor pressure <1.5 psia unless the tanks are retrofitted with an internal floating roof or a vapor recovery device. This condition was placed on these tanks when they were permitted by the MCBöH. Because these tanks have not been modified since this condition was established, it is still applicable. Therefore, Tank Nos. 1114 and 1115 are not subject to ADEM Admin. Code r. 335-3-6-.03.

ADEM Admin. Code r. 335-3-6-.04 requires a fixed roof tank with a capacity >40,000 gallons

and potential VOC emissions >100 TPY to be retrofitted with an IFR or equally effective alternative before storing a material with a vapor pressure >1.5 psia. Although Tank Nos. 1114 and 1115 exceed the capacity threshold, the potential VOC emissions from each tank are <100 TPY; therefore, these tanks would not be subject to this standard based upon the exception for sources with potential VOC emissions <100 TPY [ADEM Admin. Code r. 335-3-6-.01(1)(b)]. The State applies this exception based on the potential emissions of each tank rather than facility-wide potential emissions.

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 marine loading dock would not be subject to this standard because this regulation only applies to loading VOC products into tank trucks and trailers.

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.

Engines

Although the diesel-fired emergency generator, the two diesel-fired cargo pumps, the two diesel-fired emergency fire water pumps, and the two diesel-fired stormwater pumps are fuel combustion sources, they are not subject to any particulate matter (as TSP) emission limitation of ADEM Admin. Code r. 335-3-4 or any SO₂ emission limitation of ADEM Admin. Code r. 335-3-5 because they do not meet the definition of fuel burning equipment nor is the facility considered one of the process industries, general or specific. These engines are however, subject to the state visible emission standard of ADEM Admin. Code r. 335-3-4-.01, 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).

Other Standards/Requirements

The early operation (pre-1980) of Tank Nos. 1103, 1114, and 1115 was permitted under the authority of the MCBoH. In accordance with the regulations and standard practices of that time, these tanks were limited to the storage of materials with a TVP <1.5 psia unless the tanks were retrofitted with an internal floating roof, vapor recovery device, or equally efficient control device. When the air pollution control program for Mobile County was relinquished to the State, the permits for these tanks was reissued by ADEM (1996), preserving this condition. Tank No. 1103 was retrofitted with an internal floating roof in 2005, thus triggering Subpart Kb applicability; however, Tank Nos. 1114 and 1115 remain subject to this permit restriction.

Emission Testing and Monitoring

Tank Nos. 1101, 1104, 1105, 1106, 1110, 1111, 1112, 1114, 1115, 1116, 62061, 62062, and 62063

There are no testing requirements applicable to these tanks. To monitor compliance with 40 CFR Part 63, Subpart BBBBBB, if storing gasoline, Plains is required to equip each gasoline storage tank according to the applicable requirements specified in 40 CFR §60.112b(a)(1). In addition, Plains is required to comply with the tank inspection requirements specified in 40 CFR §63.11092(e)(1) and the monthly leak inspection requirements specified in 40 CFR §63.11089(a) through (d). Additional monitoring requirements are discussed in the recordkeeping and reporting requirements section of this document.

Tank Nos. 1102, 1103, 1108, and 1109

As referenced in 40 CFR §60.113b(a), Plains is required to visually inspect the internal floating roofs through manholes and roof hatches on the fixed roof at least once every twelve months after the initial fill. Each time the storage tanks are emptied and degassed, but no less than every 10 years, a visual inspection of the internal floating roof, primary seal, gaskets, slotted membranes and sleeve seals is also required. Subpart Kb also prescribes requirements for the monitoring of operations of each of these tanks. These requirements are discussed in the recordkeeping and reporting requirements section of this document.

Truck Loading Rack

There are no testing requirements applicable to the truck loading rack. The monitoring of operations of the truck loading rack is discussed in the recordkeeping and reporting requirements section of this document.

Marine Loading Dock

There are no testing or monitoring requirements applicable to the marine loading dock.

Engines

Plains is required to operate and maintain each engine according to the manufacturer's written instructions over the entire life of the engine. In addition, Plains would be required to equip each emergency engine with a non-resettable meter.

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.*

Tank Nos. 1101, 1104, 1105, 1106, 1110, 1111, 1112, 1114, 1115, 1116, 62061, 62062, and 62063

To demonstrate compliance with the applicable vapor pressure limits for each of these tanks, Plains is required to maintain records of the products stored and their vapor pressures under storage conditions. Plains is required by General Permit Proviso No. 21 to submit a semiannual certification indicating that all products stored at this facility were below the applicable thresholds specified in Unit Specific Proviso No. 2 for each tank. If gasoline is stored in Tank No. 1106, Plains is subject to the recordkeeping and reporting requirements specified in 40 CFR §63.11094 and 40 CFR §63.11095.

Tank Nos. 1102, 1103, 1108, and 1109

For Tank Nos. 1102, 1103, 1108, and 1109, 40 CFR §60.115b(a) requires that Plains maintain a record of each visual inspection performed. Each record should identify the tank inspected and the date the visual inspection was performed. If any problems with an internal floating roof are observed, such as the seal is detached or there are holes or tears, Plains is required to submit a report identifying the tank, the nature of the defects, the date the tank was emptied, if applicable, and the nature of and date the repair was made. This report must be submitted to the Air Division within 30 days of performing the annual visual inspection. 40 CFR §60.116b(b) requires that Plains keep readily available records showing the dimension of each storage tank and an analysis showing the storage capacity of the storage tank for the life of the source. 40 CFR §60.116b(c) also requires that Plains maintain a record of the type of VOL stored, the period of storage, and the maximum TVP of that VOL during the respective storage period for all products with a TVP >0.5 psi. Plains is required by General Permit Proviso No. 21 to submit a semiannual certification indicating that all products stored at this facility were below the applicable thresholds specified in Unit Specific Proviso No. 2 for each tank.

Truck Loading Operation

Plains is required to maintain a record of the amount of crude oil loaded through the truck loading operation (in gallons) on a monthly and 12-month rolling total basis. In addition, Plains is required to certify on a semiannual basis that all products with a TVP ≥ 1.5 psia were loaded using 95% submerged fill loading lines or an equivalent method and that all pumps employed in handling VOCs retained seals during the reporting period. Plains is also required to submit a summary of the crude oil throughput that includes the monthly and 12-month rolling totals.

Marine Loading Operation

Plains is required to submit a certification that all pumps employed in the handling of volatile

organic compounds retained mechanical seals as part of the semiannual monitoring report required by General Permit Proviso No. 21.

Emergency Generator

Plains is required by 40 CFR §60.4214(b) to keep records of the hours of operation of the emergency generator as recorded through the non-resettable hour meter. Plains is required to record the hours of operation of the engine and the reason the engine was in operation during the time for both emergency and non-emergency service.

Emergency Fire Water Pumps

Plains shall keep records of the operation and maintenance of Fire Water Pump No. 1 in accordance with 40 CFR §63.6655. At a minimum, these records shall include:

- For each period of operation, the length of operation and the reason the engine was in operation during that time. For periods of operation designated as “emergency operation,” the records shall reflect what classified the operation as emergency;
- The total number of hours each engine was operated during a calendar year subtotaled by the reason the engine was in operation;
- The dates of each oil and filter change with the corresponding hour on the hour meter;
- The dates of each inspection and replacement of air cleaners, hoses, and belts with the corresponding hour on the hour meter; and
- The dates and nature of other emission-related repairs and maintenance performed.

Plains is required to report to the Air Division any failure to perform a work practice standard on the schedule required, including instances when the work practice standard was not performed. Plains is required to submit a report within two working days of the deviation that should include an explanation as to why Plains failed to meet the standard.

For Fire Water Pump No. 2, Plains is required by 40 CFR §60.4214(b) to keep records of the hours of operation of the emergency engine as recorded through the non-resettable hour meter. Plains is required to record the hours of operation of the engine and the reason the engine was in operation during the time for both emergency and non-emergency service.

Cargo Pumps

Plains is required to keep records of the operation and maintenance of both cargo pumps in accordance with 40 CFR §63.6655. At a minimum, these records shall include:

- A copy of each notification and report that was submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of

Compliance Status that was submitted, according to the requirement in 40 CFR §63.10(b)(2)(xiv);

- Records of the occurrence and duration of each malfunction of operation or the air pollution control and monitoring equipment;
- Records of performance tests and performance evaluations as required in 40 CFR §63.10(b)(2)(viii);
- Records of all required maintenance performed on the air pollution control and monitoring equipment; and
- Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation.

Stormwater Pumps

There are no applicable recordkeeping requirements for these units.

Compliance Assurance Monitoring (CAM)

The truck loading rack and the marine loading dock are the only emission sources at the facility that have the potential to emit greater than 100 TPY of any criteria pollutant. Neither of the loading operations employs an active control device as defined in the CAM regulations; therefore, the facility would not be subject to CAM requirements. According to the application, there are no other processes at the facility that meet CAM applicability.

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

I recommend that Plains' MSOP (Facility No. 503-3013) be renewed with the conditions noted pending the resolution of any comments received during the 30-day public comment period and the EPA 45-day review period.

Rachel Kilpatrick

Rachel Kilpatrick
Chemical Branch
Air Division

September 15, 2020
Date

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