

STATEMENT OF BASIS

For the issuance of Draft Air Permit #2243-AGP-000 AFIN: Statewide

1. PERMITTING AUTHORITY:
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317
2. APPLICANT:

Qualifying Gasoline Bulk Plants
3. PERMIT WRITER:

Derrick Brown
4. NAICS DESCRIPTION AND CODE:

NAICS Description: Petroleum Bulk Stations and Terminals
NAICS Code: 424710
5. SUBMITTALS:

Date of Submittal	Type of Permitting Action (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
Not Applicable	Renewal	None.

6. REVIEWER'S NOTES:

This is a review and renewal of the General Permit for Bulk Gasoline Plants located within the borders of the state of Arkansas. This renewal adds Appendix E – example form for monthly gasoline leak inspection. Also, General Condition #23 was added to Section V: General Conditions.

The general permit for bulk gasoline plants located within the borders of the state of Arkansas includes the requirements for 40 C.F.R. Part 63, Subpart BBBBBB – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. The general permit makes all minor source bulk gasoline plants eligible for the general permit. Generally these facilities are below the permitting thresholds contained in Arkansas Regulations 18, 19 and 26. The intent of this permit is to provide an enforceable limit on the daily throughput from these facilities and thus the requirements of Part 63.

By definition in 40 C.F.R. Part 63, Subpart BBBBBB, *Bulk gasoline plant* means any gasoline storage and distribution facility that receives gasoline by pipeline, ship or barge, or cargo tank and has a gasoline throughput of less than 20,000 gallons per day. Gasoline throughput shall be the maximum calculated design throughput as may be limited by compliance with an enforceable condition under Federal, State, or local law and discoverable by the Administrator and any other person.

Only those BBBBBB conditions that relate to a bulk gasoline plant are contained in this permit.

This permit is not a requirement for these facilities but without this permit the facilities would not be restricted to 20,000 gallons per day and thus would be subject to additional requirements of 40 C.F.R. Part 63, Subpart BBBBBB.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

Not Applicable – This is a General Permit.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
If yes, were GHG emission increases significant? N

b) Is the facility categorized as a major source for PSD? N
• *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list*

If yes for 8(b), explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
Gasoline storage tanks, gasoline loading racks, vapor collection-equipped gasoline cargo tanks, and equipment components in vapor or liquid gasoline service.	There are no specific emission limits or pollutants identified, but the rules generally regulate HAPs	40 C.F.R. Part 63, Subpart BBBBBB
Reciprocating Internal Combustion Engines	HAP	40 C.F.R. Part 63 ZZZZ

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
Stationary Combustion Ignition Engines	CO, NO _x , SO ₂	40 C.F.R. Part 60 IIII
Stationary Spark Ignition Engines	CO, NO _x , SO ₂ , VOC	40 C.F.R. Part 60 JJJJ

10. EMISSION CHANGES AND FEE CALCULATION:

Not applicable to a General Permit.

11. AMBIENT AIR EVALUATIONS:

a) Reserved.

b) Non-Criteria Pollutants: N/A

c) H₂S Modeling: N/A (No H₂S emissions)

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equip.	Control Equip. Eff.	Comments
All	TANKS 4.09d	Varies	None		Tank losses based on 20,000 gallons per day throughput, using EPA's TANKS program (Fixed roof tank with Gasoline RVP 15)
All	AP-42 Chapter 5, Section 2 Equation 1	8.3 lb VOC/1,000 gal	None		VOC breathing and working losses obtained from EPA's TANKS program. Hourly loading rack emissions based on maximum filling rate of 200 gpm for 30 minutes. For Equation 1: S = 0.6

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equip.	Control Equip. Eff.	Comments
					P = 9.5936 psi _a M = 60 lb/lb-mole T = 524 R
All	AP-42 Chapter 3, Section 3 Tables 1 & 2	Varies	None		Calculations for emissions from diesel and natural gas engines respectively. Emissions were based off the amount needed to cause 40 tpy of NO _x and the higher between natural gas and diesel were chosen for each emission.
All	AP-42 Chapter 3, Section 2 Table 1	Varies	None		

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

14. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
Emergency Engines	Time	Hour meter	Continuous	N

15. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
All	Gasoline throughput	20,000 gal/day &	Daily &	No

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		7,200,000 gallons per consecutive 12-months	Monthly	
	Diesel or Jet Fuel* throughput	7,200,000 gallons per consecutive 12-months	Monthly	No
Engines	Records required by IIII, JJJJ, and ZZZZ	N/A	Annually	No
Emergency Engines	Hours of Operation	500 hrs per year	Monthly	No

*Jet Fuel added this (2020) renewal.

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
N/A			

17. DELETED CONDITIONS:

Former SC	Justification for removal
None	

18. GROUP A INSIGNIFICANT ACTIVITIES:

The insignificant activities will be detailed in the Notice of Intent.

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
All Previously Issued Permits