

**AIR EMISSION PERMIT NO. 16300010-002**  
**Major Amendment**

**IS ISSUED TO**

Newport Terminal Corporation

**NEWPORT TERMINAL CORPORATION**  
50 21<sup>st</sup> Street  
Newport, Washington County, Minnesota 55055

The emission units, control equipment and emission stacks at the stationary source authorized in this permit amendment are as described in the Permit Applications Table.

This permit amendment supersedes Air Emission Permit No. 16300010-001, and authorizes the Permittee to operate and modify the stationary source at the address listed above unless otherwise noted in Table A. The Permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Permit terms are defined in the state air pollution control rules unless explicitly defined in the permit.

Unless otherwise indicated, all Minnesota rules cited as the origin of permit terms are incorporated into the SIP under 40 CFR § 52.1220 and therefore enforceable by U.S. Environmental Protection Agency (EPA) Administrator or citizens under the Clean Air Act.

**Permit Type:** State; Limits to Avoid Part 70 and New Source Review

**Operating Permit Issue Date:** December 11, 2001

**Major Amendment Issue Date:** October 15, 2008

**Expiration Date:** Permit does not expire – Title I Conditions do not expire

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Don Smith, P.E., Manager  
Air Quality Permits Section  
Industrial Division

for Brad Moore  
Commissioner  
Minnesota Pollution Control Agency

**Permit Applications Table**

Permit Type	Application Date	Permit Action
Total Facility Operating Permit	May 18, 2001	001
Major Amendment	May 27, 2008 & August 29, 2008	002

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**NOTICE TO THE PERMITTEE:**

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	651-296-6300
Outside Metro Area	1-800-657-3864
TTY	651-282-5332

The rules governing these programs are contained in Minn. R. chs. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

**PERMIT SHIELD:**

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Subject to the limitations of Minn. R. 7007.1800 and 7017.0100, subp. 2, notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

**FACILITY DESCRIPTION:**

The Newport Terminal (facility) is a bulk transfer and storage terminal for petroleum products (gasoline and ethanol). The facility consists of three ethanol storage tanks, seven gasoline storage tanks, two small tanks for gasoline additive and for diesel fuel storage, and a transfer station with two loading racks.

**AMENDMENT DESCRIPTION:**

This is a major amendment for a New Source Performance Standards modification. The facility loading rack 1 (EU 001) is an affected facility as defined in part 60, subpart XX. The Permittee is requesting to increase the loading rate of loading rack 1. This is a modification as defined at §§ 60.2 and 60.14. Therefore loading rack 1 becomes subject to part 60 subp. XX.

This amendment replaces the 67.2 tpy EU 001 VOC limit with a 95 tpy total facility VOC limit. Restructuring the limit was done in part to account for gasoline storage tank internal floating roof landing emissions that were not included in the original emission calculations for the existing permit (16300010-001) because the calculation procedures for roof landing emissions were not available at that time.

**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-1**

10/15/08

Facility Name: Newport Terminal Corp

Permit Number: 16300010 - 002

**Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.**

**Subject Item:****Total Facility**

<b>What to do</b>	<b>Why to do it</b>
<b>SOURCE-SPECIFIC REQUIREMENTS</b>	hdr
Recordkeeping: Maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the facility including any malfunction of the air pollution control equipment or any periods during which a continuous monitoring system or monitoring device is inoperative.	40 CFR Section 60.7(b); Minn. R. 7019.0100, subp. 1
Permit Appendices: This permit contains Appendices I and II as listed in the permit Table of Contents. The Permittee shall comply with all requirements contained in the appendices.	40 CFR Section 60.503(c)(3); Minn. R. 7007.0800, subp. 2
This facility is a bulk gasoline terminal subject to 40 CFR part 63, subpart BBBBBBB. The facility is an existing affected facility subject to the requirements of subpart BBBBBBB no later than January 10, 2011.	40 CFR Sections 63.11081(a)(1) and 63.11083(b)
<b>TOTAL FACILITY VOC LIMIT</b>	hdr
Volatile Organic Compounds: less than or equal to 95.0 tons/year using 12-month Rolling Sum calculated by the 15th day of each month for the previous 12-month period using the calculation method below. This limit applies to the total VOC emissions from the facility.	Title I Condition: to avoid classification as major source under 40 CFR Section 52.21 and 40 CFR Section 63.2; Minn. R. 7007.3000;
For the first 11 months, the limits in the requirement labeled 'VOC Limit During Initial 12 Months After Permit Issuance' shall be met.	Minn. R. 7007.0800, subp. 2 to avoid major source classification under section 70.2
VOC Limit During Initial 12 Months After Permit Issuance: During the first 12 months after issuance of permit No. 16300010-002, the Permittee is subject to the applicable total facility VOC limit shown below.	Title I Condition: to avoid classification as major source under 40 CFR Section 52.21 and 40 CFR Section 63.2; Minn. R. 7007.3000;
Month 1: 35.0 tons/1 month      Month 7: 70.0 tons/7 months Month 2: 45.0 tons/2 months      Month 8: 75.0 tons/8 months Month 3: 50.0 tons/3 months      Month 9: 80.0 tons/9 months Month 4: 55.0 tons/4 months      Month 10: 85.0 tons/10 months Month 5: 60.0 tons/5 months      Month 11: 90.0 tons/11 months Month 6: 65.0 tons/6 months      Month 12: 95.0 tons/12 months	Minn. R. 7007.0800, subp. 2 to avoid major source classification under section 70.2
Month 1 is the month of permit issuance.	
<b>OPERATIONAL REQUIREMENTS</b>	hdr
The Permittee shall comply with National Primary and Secondary Ambient Air Quality Standards, 40 CFR pt. 50, and the Minnesota Ambient Air Quality Standards, Minn. R. 7009.0010 to 7009.0080. Compliance shall be demonstrated upon written request by the MPCA.	40 CFR pt. 50; Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, subps. 7A, 7L & 7M; Minn. R. 7007.0800, subps. 1, 2 & 4; Minn. R. 7009.0010-7009.0080
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment. At a minimum, the O & M plan shall identify all air pollution control equipment and shall include a preventative maintenance program for that equipment, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment to proper operation to meet applicable permit conditions, a description of the employee training program for proper operation and maintenance of the control equipment, and the records kept to demonstrate plan implementation.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.	Minn. R. 7019.1000, subp. 4

**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-2**

10/15/08

Facility Name: Newport Terminal Corp

Permit Number: 16300010 - 002

Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.	Minn. R. 7011.0150
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7030.0010 - 7030.0080
Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).	Minn. R. 7007.0800, subp. 9(A)
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
PERFORMANCE TESTING	hdr
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C.	Minn. R. ch. 7017
Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as stated in the MPCA Notice of Compliance letter granting preliminary approval. Preliminary approval is based on formal review of a subsequent performance test on the same unit as specified by Minn. R. 7017.2025, subp. 3. The limit is final upon issuance of a permit amendment incorporating the change.	Minn. R. 7017.2025
Performance Test Notifications and Submittals:  Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements.  Performance Test Notification (written): due 30 days before each Performance Test Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-test Meeting: due 7 days before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 days after each Performance Test  The Notification, Test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018.	Minn. R. 7017.2018; Minn. R. 7017.2030, subp. 1-4; Minn. R. 7017.2035, subp. 1-2; 40 CFR Section 60.8(d)
MONITORING REQUIREMENTS	hdr
Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).	Minn. R. 7007.0800, subp. 4(D)
Operation of Monitoring Equipment: Unless otherwise noted in Tables A, B, and/or C, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.	Minn. R. 7007.0800, subp. 4(D)
RECORDKEEPING	hdr
Monthly VOC Emissions Calculations: by the 15th day of each month, the Permittee shall calculate and record the following:  1. total facility VOC emissions during the following month using the following equation:  $TFE = (LR1 + LR2 + TS + TW + TL + FE + TP)/2000$  where:  TFE = total terminal facility monthly VOC emissions, tons LR1 = loading rack 1 emissions calculated under EU 001, lb/month LR2 = loading rack 2 emissions calculated under EU 002, lb/month TS = storage tank standing losses calculated under GP 001, lb/month TW = storage tank working losses calculated under GP 001, lb/month TL = tank roof landing emissions calculated under GP 001, lb/month FE = fugitive emissions calculated under FS 001, lb/month TP = tanker purging emissions calculated under FS 002, lb/month  2. total facility 12-month rolling sum VOC emissions by summing the monthly VOC emissions from the previous 12 months.	Title I Condition: to avoid classification as major source under 40 CFR Section 52.21 and 40 CFR Section 63.2; Minn. R. 7007.3000;  Minn. R. 7007.0800, subp. 2 to avoid major source classification under section 70.2; Minn. R. 7007.0800, subp. 4 & 5

**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-3**

10/15/08

Facility Name: Newport Terminal Corp

Permit Number: 16300010 - 002

If the Permittee determines that no permit amendment or notification is required prior to making a change, the Permittee must retain records of all calculations required under Minn. R. 7007.1200. These records shall be kept for a period of five years from the date that the change was made. The records shall be kept at the stationary source for the current calendar year of operation and may be kept at the stationary source or office of the stationary source for all other years. The records may be maintained in either electronic or paper format.	Minn. R. 7007.1200, subp. 4
Recordkeeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007.1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350, subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007.0800, subp. 5(B)
Recordkeeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C); meets requirement of 40 CFR Section 60.7(f) & Minn. R. 7019.0100, subp. 1
REPORTING/SUBMITTALS	hdr
Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B, and C of Minn. R. 7019.1000, subp. 3.  At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.	Minn. R. 7019.1000, subp. 3
Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B, and C of Minn. R. 7019.1000, subp. 2.  At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7019.1000, subp. 1
Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)
Emission Inventory Report: due on or before April 1 of each calendar year following permit issuance. Submit the report on a form approved by the Commissioner.	Minn. R. 7019.3000 through Minn. R. 7019.3010
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095

**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-4**

10/15/08

Facility Name: Newport Terminal Corp

Permit Number: 16300010 - 002

**Subject Item: GP 001 Storage Tanks****Associated Items:** TK 001 Tank 103 Ethanol

TK 002 Tank 104 Ethanol

TK 003 Tank 105 Ethanol

TK 004 Tank 106 Gasoline

TK 005 Tank 107 Gasoline

TK 006 Tank 108 Gasoline

TK 007 Tank 109 Gasoline

TK 008 Tank 110 Gasoline

TK 009 Tank 111 Gasoline

TK 010 Tank 112 Gasoline

TK 012 Diesel Fuel

TK 013 Gasoline additive

What to do	Why to do it
<p>Recordkeeping - Gasoline Throughput:</p> <p>By the 15 day of each month the Permittee shall calculate and record gasoline throughput during the previous calendar month as follows:</p> <ol style="list-style-type: none"> <li>1. TK 004 (Tank 106) throughput;</li> <li>2. TK 005, TK 006, TK 007, TK 008, TK 009, and TK 010 (Tank 107 - Tank 112) total throughput.</li> </ol>	<p>Title I Condition: to avoid classification as major source under 40 CFR Section 52.21 and 40 CFR Section 63.2; Minn. R. 7007.3000;</p> <p>Minn. R. 7007.0800, subp. 2 to avoid major source classification under section 70.2; Minn. R. 7007.0800, subp. 4 &amp; 5</p>
<p>Recordkeeping - Tank Landings: by the 15th day of each month the Permittee shall calculate and record the following:</p> <ol style="list-style-type: none"> <li>1. the combined total tank landings for TK 005, TK 006, TK 007, TK 008, TK 009, and TK 010 during the previous calendar month;</li> <li>2. the total tank landings for TK 004 during the previous calendar month.</li> </ol>	<p>Title I Condition: to avoid classification as major source under 40 CFR Section 52.21 and 40 CFR Section 63.2; Minn. R. 7007.3000;</p> <p>Minn. R. 7007.0800, subp. 2 to avoid major source classification under section 70.2; Minn. R. 7007.0800, subp. 4 &amp; 5</p>
<p>Standing Losses Calculations:</p> <p>By the 15th day of each month, calculate and record total tanks standing losses using the following equation:</p> $TS = 3*A + B + 6*C + D + E = 4051 \text{ lb/month}$ <p>where:</p> <p>TS = total standing losses (lbs/month)  A = ethanol tank standing loss factor, 128 lb/month/tank  B = Tank 106 (TK 004) rim seal, deck fitting, and deck seam emission factor, 360 lb/month  C = Tanks 107 - 112 (TK 005 - TK 010) rim seal, deck fitting, and deck seam loss emission factor, 551 lb/month/tank  D = Detergent Additive Tank (TK 011) standing emission factor, 1.09 lb/month  E = Fuel Oil Tank B (TK 013) standing emission factor, 0.20 lb/month</p> <p>Revise the above equation as needed for tanks taken out of service.</p>	<p>Title I Condition: to avoid classification as major source under 40 CFR Section 52.21 and 40 CFR Section 63.2; Minn. R. 7007.3000;</p> <p>Minn. R. 7007.0800, subp. 2 to avoid major source classification under section 70.2; Minn. R. 7007.0800, subp. 4 &amp; 5</p>



**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-5**

10/15/08

Facility Name: Newport Terminal Corp

Permit Number: 16300010 - 002

<p>Working Losses Calculations:</p> <p>By the 15th day of each month, calculate and record total tanks standing losses using the following equation:</p> $TW = F \cdot G + H \cdot I + J \cdot K + L \cdot M + N \cdot O$ <p>where:</p> <p>TW = working losses (lbs/month)  F = ethanol tanks (TO 001 - TK 003) working loss factor, <math>4.70 \cdot 10^{-4}</math> lbs/gal  G = monthly total combined ethanol throughput, gal/month  H = Tank 106 (TK 004) working loss factor, <math>3.02 \cdot 10^{-6}</math> lbs/gal  I = Tank 106 monthly gasoline throughput, gal/month  J = Tanks 107 - 112 (TK 005 - TK 010) working loss factor, <math>2.02 \cdot 10^{-6}</math> lbs/gal  K = Tanks 107 - 112 monthly gasoline throughput, gal/month  L = Detergent Additive Tank (TK 011) working loss factor, <math>1.06 \cdot 10^{-4}</math> tons/gal  M = Detergent Additive Tank monthly throughput, gal/month  N = Fuel Oil Tank B (TK 013) working loss factor, <math>1.44 \cdot 10^{-5}</math> tons/gal  O = Fuel Oil Tank B monthly throughput</p> <p>Monthly throughputs are in gallons.</p>	<p>Title I Condition: to avoid classification as major source under 40 CFR Section 52.21 and 40 CFR Section 63.2; Minn. R. 7007.3000;</p> <p>Minn. R. 7007.0800, subp. 2 to avoid major source classification under section 70.2; Minn. R. 7007.0800, subp. 4 &amp; 5</p>
<p>Tank Landing Emission Calculations:</p> <p>By the 15th day of each month, calculate and record total tank landing emissions using the following equation:</p> $TL = P \cdot Q + R \cdot S$ <p>TL = Tank Landing Emissions (lb/month)  P = emission factor, 2660 lb/landing for TK 005 - TK 010  Q = total number of tank roof landings during the previous month for TK 005 - TK 010  R = emission factor, 1196 lb/landing for TK 004  S = total number of TK 004 roof landings for the previous month</p>	<p>Title I Condition: to avoid classification as major source under 40 CFR Section 52.21 and 40 CFR Section 63.2; Minn. R. 7007.3000;</p> <p>Minn. R. 7007.0800, subp. 2 to avoid major source classification under section 70.2; Minn. R. 7007.0800, subp. 4 &amp; 5</p>

**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-6**

10/15/08

Facility Name: Newport Terminal Corp

Permit Number: 16300010 - 002

**Subject Item:** EU 001 Loading Rack 1 - gasoline**Associated Items:** CE 001 Flaring

SV 001 Loading Rack 1 - gasoline

What to do	Why to do it
<p>Recordkeeping - Gasoline Loading:</p> <p>By the 15th day of each month the Permittee shall calculate and record the gallons of gasoline loaded during the previous calendar month. Gasoline includes gasoline/ethanol blends and E-85.</p>	<p>Title I Condition: to avoid classification as major source under 40 CFR Section 52.21 and 40 CFR Section 63.2; Minn. R. 7007.3000;</p> <p>Minn. R. 7007.0800, subp. 2 to avoid major source classification under section 70.2; Minn. R. 7007.0800, subp. 4 &amp; 5</p>
<p>Loading Emissions Calculations:</p> <p>By the 15 day of each month the Permittee shall calculate and record the VOC loading emissions using the following equation:</p> $LR1 = ([0.987 * gal * b] + [0.013 * gal * c] + [d * c])/1000$ <p>where:</p> <p>LR1 = Loading Rack 1 monthly emissions, lbs/month  gal = gallons of gasoline loaded the previous month, CE 001 in service  b = controlled emission factor in lb/mgal (currently 0.29 lb/mgal [based on 35 mg/liter], or as revised based on performance testing)  c = uncontrolled emission factor (8.15 lb/mgal)  d = gallons of gasoline loaded, CE 001 out of service</p>	<p>Title I Condition: to avoid classification as Title I Condition: to avoid classification as major source under 40 CFR Section 52.21 and 40 CFR Section 63.2; Minn. R. 7007.3000;</p> <p>Minn. R. 7007.0800, subp. 2 to avoid major source classification under section 70.2; Minn. R. 7007.0800, subp. 4 &amp; 5</p>
<p>Notification: due 60 days before replacement of the existing single pump with additional pumps on gasoline tanks that feed Loading Rack 1 (EU 001).</p> <p>This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change.</p> <p>This requirement has been fulfilled by the submittal of the application for this permit amendment (permit No. 16300010-002).</p>	<p>40 CFR Section 60.7(a)(4)</p>
STANDARDS FOR VOC EMISSIONS	hdr
<p>Volatile Organic Compounds: less than or equal to 35 milligrams/liter of product loaded.</p>	<p>40 CFR Section 60.502(b); Minn. R. 7011.1550</p>
<p>EU 001 shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading.</p> <p>The vapor collection system shall be designed to prevent any total organic compounds vapors collected at EU 001 from passing to another loading rack.</p>	<p>40 CFR Section 60.502(a) &amp; (d); Minn. R. 7011.1550</p>
<p>(e) Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:</p> <p>(1) The Permittee shall obtain the vapor tightness documentation described in Section 60.505(b) for each gasoline tank truck which is to be loaded at the affected facility.</p> <p>(2) The Permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility.</p>	<p>40 CFR Section 60.502(e); Minn. R. 7011.1550</p>

continued

**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-7**

10/15/08

Facility Name: Newport Terminal Corp

Permit Number: 16300010 - 002

<p>(3)(i) The Permittee shall cross-check each tank identification number obtained in Section 60.502(e)(2) with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained:</p> <p>(A) If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or</p> <p>(B) If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually.</p> <p>(ii) If either the quarterly or semiannual cross-check reveals that these conditions were not maintained, the source must return to biweekly monitoring until such time as these conditions are again met.</p> <p>continued</p>	<p>40 CFR Section 60.502(e) (continued); Minn. R. 7011.1550</p>
<p>(4) The Permittee shall notify the owner or operator of each non-vapor-tight gasoline tank truck loaded at the affected facility within 1 week of the documentation cross-check in Section 60.502(e)(3).</p> <p>(5) The Permittee shall take steps assuring that the nonvapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained.</p> <p>(6) Alternate procedures to those described in Section 60.502(e)(1) through (5) for limiting gasoline tank truck loadings may be used upon application to, and approval by, the Administrator.</p>	<p>40 CFR Section 60.502(e) (continued); Minn. R. 7011.1550</p>
<p>(f) The Permittee shall act to assure that loadings of gasoline tank trucks at the affected facility are made only into tanks equipped with vapor collection equipment that is compatible with the EU 001 vapor collection system.</p> <p>(g) The Permittee shall act to assure that the EU 001 and the tank truck vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks.</p>	<p>40 CFR Section 60.502(f) &amp; (g); Minn. R. 7011.1550</p>
<p>(h) The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in Section 60.503(d).</p> <p>(i) The EU 001 vapor collection system pressure-vacuum vent shall not open at a system pressure less than 4,500 pascals (450 mm of water).</p> <p>(j) Each calendar month, the vapor collection system, the vapor processing system, and EU 001 shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.</p>	<p>40 CFR Section 60.502(h) - (j); Minn. R. 7011.1550</p>
<p><b>TEST METHODS AND PROCEDURES</b></p>	<p>hdr</p>
<p>Initial Performance Test: due 180 days after Initial Startup after EU 001 loading rate increase due to storage tank pump replacement or addition, or no later than 60 days after reaching maximum capacity after EU 001 loading rate increase due to storage tank pump replacement or addition, whichever comes first. Testing shall be conducted according to the requirements specified in 40 CFR Section 60.503.</p>	<p>40 CFR Section 60.8(a)</p>
<p>(a) In conducting the performance tests required in Section 60.8, the Permittee shall use as reference methods and procedures the test methods in appendix A of part 60 part or other methods and procedures as specified in Section 60.8, except as provided in Section 60.8(b). The three-run requirement of Section 60.8(f) does not apply to this subpart.</p> <p>(b) Immediately before the performance test required to determine compliance with Section 60.502(b) and (h), the Permittee shall use Method 21 to monitor for leakage of vapor all potential sources in the EU 001 vapor collection system equipment while a gasoline tank truck is being loaded. The Permittee shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.</p>	<p>40 CFR Section 60.503(a) &amp; (b); Minn. R. 7011.1550</p>

**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-8**

10/15/08

Facility Name: Newport Terminal Corp

Permit Number: 16300010 - 002

<p>(c) The Permittee shall determine compliance with the standards in Section 60.502(b) as follows:</p> <p>(1) The performance test shall be 6 hours long during which at least 300,000 liters of gasoline is loaded. If this is not possible, the test may be continued the same day until 300,000 liters of gasoline is loaded or the test may be resumed the next day with another complete 6-hour period. In the latter case, the 300,000-liter criterion need not be met. However, as much as possible, testing should be conducted during the 6-hour period in which the highest throughput normally occurs.</p> <p>continued</p>	<p>40 CFR Section 60.503(c); Minn. R. 7011.1550</p>
<p>(2) If the EU 001 vapor processing system is intermittent in operation, the performance test shall begin at a reference vapor holder level and shall end at the same reference point. The test shall include at least two startups and shutdowns of the vapor processor. If this does not occur under automatically controlled operations, the system shall be manually controlled.</p> <p>(3) The emission rate (E) of total organic compounds shall be computed using the equation in Appendix I of this permit.</p> <p>continued</p>	<p>40 CFR Section 60.503(c) (continued); Minn. R. 7011.1550</p>
<p>(4) The performance test shall be conducted in intervals of 5 minutes. For each interval "i", readings from each measurement shall be recorded, and the volume exhausted (V<sub>ei</sub>) and the corresponding average total organic compounds concentration (C<sub>ei</sub>) shall be determined. The sampling system response time shall be considered in determining the average total organic compounds concentration corresponding to the volume exhausted.</p> <p>(5)(i) Method 2B shall be used to determine the volume (V<sub>ei</sub>) air-vapor mixture exhausted at each interval.</p>	<p>40 CFR Section 60.503(c) (continued); Minn. R. 7011.1550</p>
<p>(6) Method 25A or 25B shall be used for determining the total organic compounds concentration (C<sub>ei</sub>) at each interval. The calibration gas shall be either propane or butane. The Permittee may exclude the methane and ethane content in the exhaust vent by any method (e.g., Method 18) approved by the Administrator.</p> <p>(7) To determine the volume (L) of gasoline dispensed during the EU 001 performance test, facility records or readings from EU 001 gasoline dispensing meters shall be used.</p>	<p>40 CFR Section 60.503(c) (continued); Minn. R. 7011.1550</p>
<p>(d) The Permittee shall determine compliance with the standard in Section 60.502(h) as follows:</p> <p>(1) A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with ±2.5 mm of water precision, shall be calibrated and installed on the EU 001 vapor collection system at a pressure tap located as close as possible to the connection with the gasoline tank truck.</p> <p>(2) During the performance test, the pressure shall be recorded every 5 minutes while a gasoline truck is being loaded; the highest instantaneous pressure that occurs during each loading shall also be recorded. Every loading position must be tested at least once during the performance test.</p>	<p>40 CFR Section 60.503(d); Minn. R. 7011.1550</p>
<p>(f) The Permittee shall use alternative test methods and procedures in accordance with the alternative test method provisions in Section 60.8(b) for flares that do not meet the requirements in Section 60.18(b).</p>	<p>40 CFR Section 60.503(f); Minn. R. 7011.1550</p>
<p>RECORDKEEPING AND REPORTING</p>	<p>hdr</p>
<p>Records Retention Period: Minn. R. 7007.0800, subp. 5(C) requires record retention for a period of five years. Although part 60 subp. XX requires record retention for only a 2 or 3 year period, the Permittee shall meet the 5-year retention requirement of Minn. R. 7007.0800, subp. 5(C) for all records required by part 60 subp. XX.</p>	<p>Minn. R. 7007.0800, subp. 2 &amp; 5(C)</p>

**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-9**

10/15/08

Facility Name: Newport Terminal Corp

Permit Number: 16300010 - 002

<p>(a) The tank truck vapor tightness documentation required under Section 60.502(e)(1) shall be kept on file at the terminal in a permanent form available for inspection.</p> <p>(b) The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, as a minimum, the following information:</p> <p>(1) Test title: Gasoline Delivery Tank Pressure Test-EPA Reference Method 27.</p> <p>(2) Tank owner and address.</p> <p>(3) Tank identification number.</p> <p>(4) Testing location.</p> <p>(5) Date of test.</p> <p>(6) Tester name and signature.</p> <p>(7) Witnessing inspector, if any: Name, signature, and affiliation.</p> <p>(8) Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs).</p>	<p>40 CFR Section 60.505(a) &amp; (b); Minn. R. 7011.1550</p>
<p>(c) A record of each monthly leak inspection required under Section 60.502(j) shall be kept on file at the terminal for at least 2 years. Inspection records shall include, as a minimum, the following information:</p> <p>(1) Date of inspection.</p> <p>(2) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).</p> <p>(3) Leak determination method.</p> <p>(4) Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).</p> <p>(5) Inspector name and signature.</p> <p>(d) The Permittee shall keep documentation of all notifications required under Section 60.502(e)(4) on file at the facility for at least 2 years.</p>	<p>40 CFR Section 60.505(c) &amp; (d); Minn. R. 7011.1550</p>
<p>(e) As an alternative to keeping records at the facility of each gasoline cargo tank test result as required in 40 CFR Section 60.505(a), (c), and (d), the Permittee may comply with the requirements in either 40 CFR Section 60.505(e)(1) or 40 CFR Section 60.505(e)(2).</p> <p>(1) An electronic copy of each record is instantly available at the facility.</p> <p>(i) The copy of each record in Section 60.505(e)(1) is an exact duplicate image of the original paper record with certifying signatures.</p> <p>(ii) The permitting authority is notified in writing that the facility is in compliance with Section 60.505(e)(1).</p> <p>continued</p>	<p>40 CFR Section 60.505(e)(1); Minn. R. 7011.1550</p>
<p>(2) For facilities that utilize a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by permitting authority representatives during the course of a site visit, or within a mutually agreeable time frame.</p> <p>(i) The copy of each record in Section 60.505(e)(2) is an exact duplicate image of the original paper record with certifying signatures.</p> <p>(ii) The permitting authority is notified in writing that the facility is in compliance with Section 60.505(e)(2).</p>	<p>40 CFR Section 60.505(e)(2); Minn. R. 7011.1550</p>
<p>(f) The Permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least 3 years.</p>	<p>40 CFR Section 60.505(f); Minn. R. 7011.1550</p>

**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-10**

10/15/08

Facility Name: Newport Terminal Corp

Permit Number: 16300010 - 002

**Subject Item:** EU 002 Loading Rack 2 - diesel fuel and loading**Associated Items:** SV 002 Loading Rack 2 - diesel fuel and ethanol loading

What to do	Why to do it
<p>Recordkeeping - Fuel Oil Loading:</p> <p>By the 15 day of each month the Permittee shall calculate and record the gallons of No. 1 Fuel Oil and No. 2 Fuel Oil. Separate records of each fuel oil grade shall be kept.</p>	<p>Title I Condition: to avoid classification as major source under 40 CFR Section 52.21 and 40 CFR Section 63.2; Minn. R. 7007.3000;</p> <p>Minn. R. 7007.0800, subp. 2 to avoid major source classification under section 70.2; Minn. R. 7007.0800, subp. 4 &amp; 5</p>
<p>Loading Rack 2 Emissions Calculations:</p> <p>By the 15 day of each month the Permittee shall calculate and record the loading rack 2 VOC emissions using the following equation:</p> $LR2 = [A1 * 0.0176 \text{ lb/mgal}] + [D2 * 0.0134 \text{ lb/mgal}]/1000$ <p>where:</p> <p>LR2 = loading rack 2 monthly emissions, lb/month A1 = gallons of No. 1 Fuel Oil loaded during the previous month D2 = gallons of No. 2 Fuel Oil loaded during the previous month</p>	<p>Title I Condition: to avoid classification as major source under 40 CFR Section 52.21 and 40 CFR Section 63.2; Minn. R. 7007.3000;</p> <p>Minn. R. 7007.0800, subp. 2 to avoid major source classification under section 70.2; Minn. R. 7007.0800, subp. 4 &amp; 5</p>

**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-11**

10/15/08

Facility Name: Newport Terminal Corp

Permit Number: 16300010 - 002

**Subject Item:** CE 001 Flaring**Associated Items:** EU 001 Loading Rack 1 - gasoline

MR 001 Temperature reading

What to do	Why to do it
The presence of a flare pilot flame shall be monitored using an ultraviolet sensor or any other equivalent device to detect the presence of a flame. Sensor readings shall be either electronically recorded, manually recorded at 15 minute intervals, or printed on a continuous hard copy readout.	Title I Condition: to avoid classification as major source under 40 CFR Section 52.21 and 40 CFR Section 63.2; Minn. R. 7007.3000;  Minn. R. 7007.0800, subp. 2 to avoid major source classification under section 70.2; Minn. R. 7007.0800, subp. 4 & 5

**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-12**

10/15/08

Facility Name: Newport Terminal Corp

Permit Number: 16300010 - 002

**Subject Item: FS 001 Valves, Flanges, & Seals**

What to do	Why to do it
The Permittee shall keep an updated record of the FS 001 inventory. The inventory shall state the number of valves, flanges, and pump seals. As of May 2008 there were 152 valves, 686 flanges, and 17 pump seals.	Title I Condition: to avoid classification as major source under 40 CFR Section 52.21 and 40 CFR Section 63.2; Minn. R. 7007.3000;  Minn. R. 7007.0800, subp. 2 to avoid major source classification under section 70.2; Minn. R. 7007.0800, subp. 4 & 5
Fugitive Emissions Calculations:  By the 15th day of each month, calculate and record fugitive VOC emissions as follows:  $FE = T*U + V*W + X*Y$  where:  FE = fugitive emissions, lb/month T = total valve count U = valve emission factor, $6.92*10^{-2}$ lb/month/valve V = total flange count W = flange emission factor, $1.29*10^{-2}$ lb/month/flange X = total pump seal count Y = pump seal emission factor, $8.68*10^{-1}$ lb/month/seal	Title I Condition: to avoid classification as major source under 40 CFR Section 52.21 and 40 CFR Section 63.2; Minn. R. 7007.3000;  Minn. R. 7007.0800, subp. 2 to avoid major source classification under section 70.2; Minn. R. 7007.0800, subp. 4 & 5



TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Newport Terminal Corp  
Permit Number: 16300010 - 002

Subject Item: FS 002 Tanker Purging

What to do	Why to do it
<p>Recordkeeping - Tanker Purging:</p> <p>By the 15th day of each month the Permittee shall calculate and record the following:</p> <p>1. total number of 8500 gallon cargo tankers purged during the previous calendar month;</p> <p>2. monthly purging emissions as follows:</p> <p><math>TP = Z \cdot AA \cdot 8500</math></p> <p>where:</p> <p>TP = tanker purging emissions, lb/month Z = purging emission factor, 0.00815 lb/gallon gasoline AA = total number of 8500 gallon tanker purged during the previous month</p>	<p>Title I Condition: to avoid classification as major source under 40 CFR Section 52.21 and 40 CFR Section 63.2; Minn. R. 7007.3000;</p> <p>Minn. R. 7007.0800, subp. 2 to avoid major source classification under section 70.2; Minn. R. 7007.0800, subp. 4 &amp; 5</p>

## TABLE B: SUBMITTALS

B-1 10/15/08

Facility Name: Newport Terminal Corp  
Permit Number: 16300010 - 002

Also, where required by an applicable rule or permit condition, send to the Permit Technical Advisor notices of:

- accumulated insignificant activities,
- installation of control equipment,
- replacement of an emissions unit, and
- changes that contravene a permit term.

Table B lists most of the submittals required by this permit. Please note that some submittal requirements may appear in Table A or, if applicable, within a compliance schedule located in Table C. Table B is divided into two sections in order to separately list one-time only and recurrent submittal requirements.

Each submittal must be postmarked or received by the date specified in the applicable Table. Those submittals required by parts 7007.0100 to 7007.1850 must be certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Other submittals shall be certified as appropriate if certification is required by an applicable rule or permit condition.

Send submittals that are required to be submitted to the U.S. EPA regional office to:

Mr. George Czerniak  
Air and Radiation Branch  
EPA Region V  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Send any application for a permit or permit amendment to:

AQ Permit Technical Advisor  
Industrial Division  
Minnesota Pollution Control Agency  
520 Lafayette Road North  
St. Paul, Minnesota 55155-4194

Send submittals that are required by the Acid Rain Program to:

U.S. Environmental Protection Agency  
Clean Air Markets Division  
1200 Pennsylvania Avenue NW (6204N)  
Washington, D.C. 20460

Unless another person is identified in the applicable Table, send all other submittals to:

AQ Compliance Tracking Coordinator  
Industrial Division  
Minnesota Pollution Control Agency  
520 Lafayette Road North  
St. Paul, Minnesota 55155-4194

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

Facility Name: Newport Terminal Corp  
Permit Number: 16300010 - 002

What to send	When to send	Portion of Facility Affected
Testing Frequency Plan	due 60 days after Initial Performance Test for VOC emissions. The plan shall specify a testing frequency based on the test results and MPCA guidance. Future performance tests at 12-month, 36-month, or 60-month intervals, or as applicable, shall be required upon written approval of the plan by the MPCA.	EU001

**TABLE B: RECURRENT SUBMITTALS****B-3** 10/15/08

Facility Name: Newport Terminal Corp

Permit Number: 16300010 - 002

<b>What to send</b>	<b>When to send</b>	<b>Portion of Facility Affected</b>
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 12/11/2001. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31. If no deviations occurred, the Permittee shall submit the report stating no deviations.	Total Facility
Compliance Certification	due 30 days after end of each calendar year starting 12/11/2001 (for the previous calendar year). Submit the certification to the Commissioner on a form approved by the Commissioner. This certification covers all deviations experienced during the calendar year.	Total Facility

## APPENDICES

Facility Name: Newport Terminal Corporation  
Permit Number: 16300010-002

### APPENDIX I

#### EU 001 LOADING RACK 1 VOC EMISSION CALCULATION EQUATION

$$E = K \sum_{i=1}^n (V_{esi} C_{ei}) / (L 10^6)$$

where:

E=emission rate of total organic compounds, mg/liter of gasoline loaded.

V<sub>esi</sub>=volume of air-vapor mixture exhausted at each interval “i”, scm.

C<sub>ei</sub>=concentration of total organic compounds at each interval “i”, ppm.

L=total volume of gasoline loaded, liters.

n=number of testing intervals.

i=emission testing interval of 5 minutes.

K=density of calibration gas, 1.83×10<sup>6</sup> for propane and 2.41×10<sup>6</sup> for butane, mg/scm.

## APPENDICES

Facility Name: Newport Terminal Corporation  
Permit Number: 16300010-002

### APPENDIX II INSIGNIFICANT ACTIVITIES REQUIRED TO BE LISTED

The table below lists the insignificant activities that are currently at the facility and their associated general applicable requirements.

<b>Minn. R. 7007.1300, subp.</b>	<b>Rule Description of the Activity</b>	<b>General Applicable Requirement</b>
4(B)	Potential emissions of 2.28 pounds per hour or actual emissions of one ton per year for particulate matter, particulate matter less than ten microns, nitrogen oxide, sulfur dioxide, and VOCs. <i>The facility has 2 storage tanks and loading rack 2 that are insignificant sources. The combined PTE of these two tanks is less than 2 tpy of VOCs.</i>	none

Under Minn. R. 7007.1250, subp. 1(A), the Permittee may add insignificant activities to the stationary source throughout the term of the permit without getting permit amendments. Certain exclusions apply and are listed in Minn. R. 7007.1250, subp. 2. In addition, this permit specifically prohibits the Permittee from making any modifications that would make the source major under NSR. The following table is a listing of the insignificant activities that the Permittee is somewhat likely to add and their associated applicable requirements.

<b>Minn. R. 7007.1300, subp.</b>	<b>Rule Description of the Activity</b>	<b>General Applicable Requirement</b>
3(A)	Fuel use: space heaters fueled by, kerosene, natural gas, or propane.	Minn. R. 7011.0510/0515
3(H)	Miscellaneous:	
	(2) equipment used for hydraulic or hydrostatic testing;	Minn. R. 7011.0710/0715
	(3) brazing, soldering or welding equipment;	Minn. R. 7011.0510/.0515, Minn. R. 7011.0610 and Minn. R. 7011.0710/0715 (PM and opacity)
	(4) blueprint copiers and photographic processes;	Minn. R. 7011.0105/0110 (opacity)
	(7) cleaning operations: alkaline/phosphate cleaners and associated cleaners and associated burners.	Minn. R. 7011.0510/.0515, Minn. R. 7011.0610 and Minn. R. 7011.0710/0715 (PM and opacity)
3(J)	Fugitive Emissions from roads and parking lots.	Minn. R. 7011.0150 (PM)
3(K)	Infrequent use of spray paint equipment for routine housekeeping or plant upkeep activities not associated with primary production processes at the stationary source.	Minn. R. 7011.0710/0715 (VOC)

**TECHNICAL SUPPORT DOCUMENT**  
**For**  
**AIR EMISSION PERMIT NO. 16300010-002**

This technical support document (TSD) is for parties interested in the draft/proposed permit and meets the requirements of 40 CFR § 70.7(a)(5) and Minn. R. 7007.0850, subp. 1. This document provides legal and factual justification for each applicable requirement or policy decision considered in the determination to issue the draft/proposed permit.

**1. General Information**

**1.1. Applicant and Stationary Source Location:**

Owner and Operator Address and Phone Number (list both if different)	Facility Address (SIC Code: 5171)
Newport Terminal Corporation 4567 American Boulevard West Bloomington, MN 55437 Responsible Official: Mr. Richard Mills Environmental Mgr: Mr. Bruce Anthony Email: bruce.anthony@holidaycompanies.com	50 21 <sup>st</sup> Street Newport, MN 55055 Washington County 952-830-8709 952-830-8899 Fax: 952-830-1681

**1.2. Facility Description**

The Newport Terminal (facility) is a bulk transfer and storage terminal for petroleum products (gasoline and diesel fuel). The facility consists of three ethanol storage tanks, seven gasoline storage tanks, two small tanks for gasoline additive and for diesel fuel storage, and a transfer station with two loading racks. Loading Rack 1 (used for blended gasoline loadout) has a vapor collections system that vents to a flare with propane pilots. The facility operates under a federally enforceable state operating permit (FESOP).

Volatile Organic Compounds (VOC) are the main pollutant from the facility, including volatile Hazardous Air Pollutants (HAP). The VOCs are emitted from product loading, storage tank standing and working losses, tank roof landing events, fugitive emissions from valves, pumps, and flanges, and tanker purging. Ethanol and sub-octane gasoline are blended as they are loaded into gasoline cargo tanks to produce 87 octane no lead regular gasoline with 10 percent ethanol.

The VOC emissions from unloading of gasoline from delivery trucks to gasoline service station storage tanks at service stations are collected and then displaced from the cargo tanker upon tanker refilling at the facility. The displaced vapors are captured by the Loading Rack 1 vapor capture system and then vented to the flare.

Tankers may occasionally be purged of vapors to allow for maintenance, by pumping air into the tanker to displace the combustible vapors. These vapors cannot be vented to the flare system

during purging because this could create explosive mixtures in the vapor collection system as the air/gasoline vapor mixture pass through the explosive range.

The facility is a Petroleum storage and transfer unit with a total storage capacity exceeding 300,000 barrels (equivalent to 12.6 mmgal) and therefore is one of the 28 listed source categories under new source review. As a result the facility is subject to the 100 tpy major source threshold of a regulated pollutant, including fugitives. However, limited controlled VOC emissions are less than Part 70 and Prevention of Significant Deterioration (PSD) major source thresholds in order to avoid PSD permitting requirements.

### **1.3 Description of the Activities Allowed by this Permit Action**

This is a major amendment for a New Source Performance Standards modification. Loading Rack 1 (EU 001) is an affected facility as defined in part 60, subpart XX. The Permittee is requesting to increase gasoline pumping capacity to Loading Rack 1. This change involves a capital expense and increases VOC lb/hr potential emissions from Loading Rack 1, and therefore is a modification as defined at §§60.2 and 60.14. Therefore Loading Rack 1 becomes subject to part 60 subp. XX. The cost of the modification should be well below the 50 percent cost threshold for reconstruction under parts 60 and 63, and therefore the facility will not be reconstructed.

Loading Rack 1 can accommodate two tanker trucks at a time. Cargo tanks have a capacity of 8,500 gallons of gasoline, and currently it takes 30 minutes to load each truck. The current maximum hourly loading capacity is 37,400 gallons per hour including a 10 percent safety factor. After the proposed modification is completed it will take 15 to 20 minutes to load each truck resulting in a maximum hourly loading capacity of 74,800 gallons per hour including a 10 percent safety factor.

Loading Rack 1 VOC emissions are a combination of controlled and uncontrolled emissions. The majority of gasoline vapor emissions from truck loading are captured by a vapor collection system and controlled by the flare system. The flare manufacturer's performance guaranty of 35 mg VOC/liter of gasoline dispensed is equal to the applicable limit in subpart XX. Uncontrolled emissions are from leaks in the vapor collection system and tank trucks (equals 1.3 percent of the total (uncontrolled) truck loading VOCs). The facility will perform periodic leak inspections, as specified in subpart XX, to minimize uncontrolled VOC emissions due to leaks.

The facility will remain a minor source for HAPs and therefore will not be subject to part 63, subp. R National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) or part 63, subp. CC National Emission Standards for Hazardous Air Pollutants From Petroleum Refineries. However, the source will be subject to the newly promulgated MACT standard part 63 subp. BBBB for area source gasoline terminals (applies to area source terminals that load a minimum of 20,000 gallons per day; this facility will have a capacity to load over 1.7 mmgal/day of gasoline).



The Loading Rack 1 modification is not reconstruction as defined under §63.2. Therefore the facility is an existing facility for purposes of subpart BBBB and becomes subject to the standard on January 10, 2011.

This amendment replaces the 67.2 tpy EU 001 VOC limit with a 95 tpy total facility VOC limit. Restructuring the limit was done in part to account for gasoline storage tank internal floating roof landing emissions that were not included in the original emission calculations for the existing permit (16300010-001) because the calculation procedures for roof landing emissions were not available at that time.

TK 011 also known as Tank B (17,000 gallon gasoline storage tank) has been removed. The Delta permit database has been updated to reflect this. Also, the description of Loading Rack 2 (EU 002; an insignificant activity) was revised to indicate that only diesel fuel is loaded through Loading Rack 2; the existing FESOP incorrectly indicated that diesel and ethanol were loaded by Loading Rack 2. Loading Rack 1 loads E-85, and unleaded gasoline with 10 percent ethanol. Loading Rack 2 loads only diesel fuel.

#### 1.4. Facility Emissions:

**Table 1. Title I Emissions Increase Summary**

Pollutant	Emissions Increase from the Modified Emission Unit (lb/hr)	NSPS Threshold
PM	0	Any lb/hr potential emissions increase from an emission unit due to a modification to that unit involving a capital expenditure
PM <sub>10</sub>	0	
NO <sub>x</sub>	0	
SO <sub>2</sub>	0	
CO	0	
Ozone (VOC)	14.74	
Lead	0	

**Table 2. Total Facility Potential to Emit Summary<sup>1</sup>**

	PM tpy	PM <sub>10</sub> tpy	SO <sub>2</sub> tpy	NO <sub>x</sub> tpy	CO tpy	VOC tpy	Single HAP tpy	All HAPs tpy
Total Facility Limited Potential Emissions	0.06	0.06	0.80	5.51	13.7	95.0	1.76	3.82
Total Facility Actual Emissions (2006)	0	0	0	0	0	52.97	HAPs not reported in emission inventory	

<sup>1</sup>PM, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, and CO emissions are from flare; data from permit No. 16300010-001

**Table 3. Facility Classification**

<b>Classification</b>	<b>Major/Affected Source</b>	<b>Synthetic Minor</b>	<b>Minor</b>
PSD	NA	VOC	PM, PM <sub>10</sub> , SO <sub>2</sub> , NO <sub>x</sub> , Lead
Part 70 Permit Program	NA	VOC	PM <sub>10</sub> , SO <sub>2</sub> , NO <sub>x</sub> , Lead
Part 63 NESHAP	NA		HAPs

## **2. Regulatory and/or Statutory Basis**

### New Source Review

The facility is an existing synthetic minor source under New Source Review regulations. No changes are authorized by this permit.

### Part 70 Permit Program

The facility is an existing synthetic minor source under the Part 70 permit program. No changes are authorized by this permit.

### New Source Performance Standards (NSPS)

Loading Rack 1 (EU 001) will be modified as defined by NSPS and will be subject to subpart XX.

### National Emission Standards for Hazardous Air Pollutants (NESHAP)

The facility will remain a minor source for HAPs and therefore will not be subject to part 63, subp. R. However, the source will be subject to the newly promulgated MACT standard part 63 subp. BBBB for area source gasoline terminals (applies to area source terminals that load a minimum of 20,000 gallons per day; this facility will have a capacity to load over 1.7 mmgal/day of gasoline). The facility is an existing facility for purposes of subpart BBBB and will become subject to the standard on January 10, 2011.

### Minnesota State Rules

Portions of the facility are subject to Minn. R. 7011.1500 Standards of Performance for Liquid Storage Vessels.

**Table 4. Regulatory Overview of Units Affected by the Modification/Permit Amendment**

<b>EU, GP, or SV</b>	<b>Applicable Regulations</b>	<b>Comments:</b>
Total Facility	Title I Condition: to avoid major source status under 52.21 and 63.2; Minn. R. 7007.0800, subp. 2 to avoid part 70 major source status	Total facility limit of 95 tpy VOC emissions on a 12-month rolling sum basis.
GP 001		Monitoring and recordkeeping of throughput and emissions of VOC

<b>EU, GP, or SV</b>	<b>Applicable Regulations</b>	<b>Comments:</b>
EU 001	Part 60 Subpart XX  Title I Condition: to avoid major source status under 52.21 and 63.2; Minn. R. 7007.0800, subp. 2 to avoid part 70 major source status	New Source Performance Standard for Bulk Gasoline Terminals  Monitoring and recordkeeping of throughput and emissions of VOC
EU 002 FS 001 FS 002	Title I Condition: to avoid major source status under 52.21 and 63.2; Minn. R. 7007.0800, subp. 2 to avoid part 70 major source status	Monitoring and recordkeeping of throughput and emissions of VOC

### **3. Technical Information**

#### **3.1 Emissions Calculations**

Emission calculations are attached to this technical support document.

#### **3.2 Periodic Monitoring**

In accordance with the Clean Air Act, it is the responsibility of the owner or operator of a facility to have sufficient knowledge of the facility to certify that the facility is in compliance with all applicable requirements.

In evaluating the monitoring included in the permit, the MPCA considers the following:

- The likelihood of violating the applicable requirements;
- Whether add-on controls are necessary to meet the emission limits;
- The variability of emissions over time;
- The type of monitoring, process, maintenance, or control equipment data already available for the emission unit;
- The technical and economic feasibility of possible periodic monitoring methods; and
- The kind of monitoring found on similar units elsewhere.

Table 5 summarizes the periodic monitoring requirements for those emission units for which the monitoring required by the applicable requirement is nonexistent or inadequate.

**Table 5. Periodic Monitoring**

<b>Emission Unit or Group</b>	<b>Requirement (basis)</b>	<b>Additional Monitoring</b>	<b>Discussion</b>
Total Facility	VOC: $\leq 95.0$ tpy on a 12-month rolling sum Title I Condition: to avoid major source status under §§52.21 and 63.2; Minn. R. 7007.0800, subp. 2 to avoid part 70 major source status	Monthly summation of VOC emissions from facility VOC emission sources	Calculation of total facility VOC emissions by the 15 <sup>th</sup> day of each month will allow the Permittee to demonstrate compliance with the 95 tpy limit.
GP 001	Title I Condition: to avoid major source status under §§52.21 and 63.2; Minn. R. 7007.0800, subp. 2 to avoid part 70 major source status	Monthly calculation of storage tank throughput and VOC emissions	Calculation of storage tank throughput and VOC emissions by the 15 <sup>th</sup> day of each month will allow the Permittee to demonstrate compliance with the total facility 95 tpy limit.
EU 001	Title I Condition: to avoid major source status under §§ 52.21 and 63.2; Minn. R. 7007.0800, subp. 2 to avoid part 70 major source status  40 CFR Part 60 Subpart XX	Monthly calculation of gasoline throughput and VOC emissions  None	Calculation of Loading Rack 1 gasoline throughput and VOC emissions by the 15 <sup>th</sup> day of each month will allow the Permittee to demonstrate compliance with the total facility 95 tpy limit.  This new source performance standard contains adequate monitoring to ensure vapor capture and control from the loading of gasoline tanker trucks. This includes performance testing to verify compliance with the 35 mg/liter VOC limit and maximum cargo tank pressure of 4,500

<b>Emission Unit or Group</b>	<b>Requirement (basis)</b>	<b>Additional Monitoring</b>	<b>Discussion</b>
			pascals during gasoline tanker loading.
EU 002	Title I Condition: to avoid major source status under §§ 52.21 and 63.2; Minn.	Monthly calculation of diesel fuel throughput and VOC emissions	Calculation of Loading Rack 2 diesel fuel throughput and VOC emissions by the 15 <sup>th</sup> day of each month will allow the Permittee to demonstrate compliance with the total facility 95 tpy limit.
CE 001	R. 7007.0800, subp. 2 to avoid part 70 major source status	Monitoring to verify presence of flame for control of VOCs	Flame presence indicates that the flare is operating and controlling VOC vapors collected from the vapor collection system associated with Loading Rack 1.
FS 001	Title I Condition: to avoid major source status under §§ 52.21 and 63.2; Minn.	Monthly calculation of VOC emissions from valves, flanges, & pump seals in service	Calculation of VOC leaks from seals, flanges, and valves by the 15 <sup>th</sup> day of each month will allow the Permittee to demonstrate compliance with the total facility 95 tpy limit.
FS 002	R. 7007.0800, subp. 2 to avoid part 70 major source status	Monthly calculation of tanker purging VOC emissions	Calculation of tanker purging VOC emissions by the 15 <sup>th</sup> day of each month will allow the Permittee to demonstrate compliance with the total facility 95 tpy limit.

### **3.3 Insignificant Activities**

Certain operations at the facility are classified as insignificant activities. These are listed in Appendix II of the permit. Emissions from these sources are small and uncontrolled and very unlikely to exceed any applicable standard. Therefore no monitoring is warranted.

### **3.4 Comments Received**

Public Notice Period: September 13 – October 13, 2008

EPA 45-day Review Period: September 13 – October 13, 2008

No comments were received.

#### 4. Conclusion

Based on the information provided by Newport Terminal Corporation, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 16300010-002 and this TSD, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team:      Marshall Cole (permit writer/engineer)  
   Enforcement: none due to staff vacancy per current policy  
   Curt Stock (stack testing)  
   Trevor Shearen (peer reviewer)

AQ File No. 1068; DQ 2074

Attachments:    1. Emissions Calculations  
                         2. Facility Description and CD-01 Forms