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# PART 70 OPERATING PERMIT

**SOURCE ID: 00013**

Calnev Pipe Line LLC  
5049 North Sloan Lane  
Las Vegas, Nevada 89115

**ISSUED ON: January 29, 2024**

**EXPIRES ON: January 28, 2029**

**Current action: Minor Revision**

**Revised On: February 24, 2025**

**Issued to:**

Calnev Pipe Line LLC  
1001 Louisiana Street  
Products EHS Compliance Fl 8, Suite 1000  
Houston, Texas 77002

**Responsible Official:**

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**NATURE OF BUSINESS:**

SIC code 4226, "Special warehousing and Storage, Not Elsewhere Classified"

NAICS code 493190, "Other Warehousing and Storage"

**Issued by the Clark County Department of Environment and Sustainability/Division of Air Quality in accordance with Section 12.5 of the Clark County Air Quality Regulations.**

Santosh Mathew, Permitting Manager

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## EXECUTIVE SUMMARY

Calnev Pipe Line LLC is a bulk fuel storage and transfer operation located in the Las Vegas Valley (Hydrographic Area [HA] 212), which is currently designated as an attainment area for all regulated air pollutants except ozone. Hydrographic Area 212 was designated a moderate nonattainment area for ozone on January 5, 2023. The designation did not impose any new requirements at that time. Hydrographic Area 212 was designated a serious nonattainment area for ozone on January 21, 2025. Clark County has drafted or imposed new requirements to address this designation. The source is classified as a Categorical Stationary Source, as defined by AQR 12.2.2(j)(23): “Petroleum storage and transfer units with total storage capacity exceeding 300,000 barrels.” The source is a major source for volatile organic compound (VOC) pollutants and a minor source for all other criteria pollutants and hazardous air pollutants (HAP). The source consists of petroleum storage tanks, vapor holding tank, loading lanes, diesel-powered air compressor, diesel-powered fire water engine, cooling tower, wastewater treatment system, and haul roads. The source falls under SIC code 4226, “Special Warehousing and Storage, Not Elsewhere Classified” and NAICS code 493190, “Other Warehousing and Storage.”

Fuels are delivered to the site by two underground pipelines originating in southern California. Incoming fuels are diverted to storage tanks; from there, fuels are piped to other terminals or loaded onto delivery trucks. As the trucks are filled, specialized additives are injected according to the customer’s specifications.

This Part 70 Operating Permit (OP) is issued based on the Title V renewal application submitted on November 16, 2021, and the minor revision application submitted on November 13, 2024. Pursuant to AQR 12.5.2, all terms and conditions in Sections 1–8 in this permit are federally enforceable unless explicitly denoted otherwise.

The following table summarizes the source’s potential to emit (PTE) of each regulated air pollutant from all emission units addressed by this Part 70 OP.

**Table 1: Source-wide Potential to Emit**

Pollutant	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAPs <sup>1</sup>	Pb	H <sub>2</sub> S	GHG <sup>2</sup>
Tons/year	9.85	1.58	3.26	2.55	0.18	188.00	9.30	0	0	11,440.88

<sup>1</sup> A major source is defined as 10 tons for any individual HAP or 25 tons for combination of all HAPs.

<sup>2</sup> Metric tons per year of carbon dioxide equivalent. GHG = greenhouse gas pollutants.

DAQ received the Title V minor revision application on November 13, 2024. Based on information submitted by the applicant and a technical review performed by DAQ staff, DAQ proposes the issuance of a revised Part 70 OP to Calnev Pipe Line LLC.

DAQ will continue to require the permittees to estimate their GHG PTE in terms of each individual pollutant (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, SF<sub>6</sub> etc.) during subsequent permitting actions, and the corresponding TSDs will include these PTEs for informational purposes.

This bulk gasoline terminal is subject to 40 CFR Part 60, Subparts A, Ka, Kb, XX and 40 CFR Part 63, Subparts A, BBBB, WW, and ZZZZ.

Pursuant to AQR 12.5.2, all terms and conditions and attachments to this permit, are federally enforceable unless explicitly denoted otherwise.

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## Acronyms and Abbreviations

API	American Petroleum Institute
AQR	Clark County Air Quality Regulation
AST	aboveground storage tank
ATC	Authority to Construct
CEMS	continuous emissions monitoring system
CFR	Code of Federal Regulations
CO	carbon monoxide
DAQ	Division of Air Quality
DOM	date of manufacture
EPA	U.S. Environmental Protection Agency
EU	emission unit
HAP	hazardous air pollutant
JZVRU	John Zink Vapor Recovery Unit
MMBtu/hr	Millions of British thermal units per hour
MSP	minor source permit
NAICS	North American Industry Classification System
NRS	Nevada Revised Statutes
NSR	New Source Review
OP	Operating Permit
PID	Photoionization detector
PM <sub>2.5</sub>	particulate matter less than 2.5 microns in diameter
PM <sub>10</sub>	particulate matter less than 10 microns in diameter
ppm(vd)	parts per million (volume dry)
PTE	potential to emit
RATA	relative accuracy test audits
RVP	Reid vapor pressure
SIC	Standard Industrial Classification
TDS	total dissolved solids
TOC	total organic compounds
TPH	total petroleum hydrocarbons
UST	underground storage tank
VEE	Visible Emissions Evaluation
VOC	volatile organic compound
VOL	volatile organic liquid
VRU	vapor recovery unit

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## 1.0 EQUIPMENT

### 1.1 EMISSION UNITS

The stationary source covered by this Part 70 Operating Permit (OP) consists of the emission units and associated appurtenances summarized in Table 1-1. [Title V OP January 29, 2024; ATC June 2, 2019; ATC September 23, 2014; ATC April 8, 2014; ATC December 20, 2012; ATC August 31, 2010; ATC May 30, 2008; ATC April 10, 2008; ATC October 2, 2008; ATC March 5, 2007]

**Table 1-1: List of Emission Units - Tanks, Racks, Fuel Unloading, VRU, and Miscellaneous Units**

EU	Source ID No.	Rating	Description	Product Stored	Optional Stored Products <sup>1</sup>
<b>Bulk Petroleum Storage Tanks</b>					
A01	Tank 530	11,200 bbl	External Floating Roof AST w/Primary and Secondary Seal	Diesel	Gasoline, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
A02	Tank 531	12,890 bbl	External Floating Roof AST w/Primary and Secondary Seal	Diesel	Gasoline, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
A03	Tank 532	8,080 bbl	External Floating Roof AST w/Primary and Secondary Seal	Gasoline	Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
A04	Tank 533	11,330 bbl	External Floating Roof AST w/Primary and Secondary Seal	Gasoline	Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
A05	Tank 534	8,080 bbl	External Floating Roof AST w/Primary and Secondary Seal	Transmix	Gasoline, Diesel, Biodiesel, Denatured Ethanol, Aviation Gasoline and Jet Fuel
A06	Tank 535	8,080 bbl	External Floating Roof AST w/Primary and Secondary Seal	Gasoline	Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
A07	Tank 536	17,550 bbl	External Floating Roof AST w/Primary and Secondary Seal	Gasoline	Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
A08	Tank 537	22,250 bbl	External Floating Roof AST w/Primary and Secondary Seal	Gasoline	Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
A09	Tank 538	11,330 bbl	External Floating Roof AST w/Primary and Secondary Seal	Gasoline	Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
A10	Tank 539	11,330 bbl	External Floating Roof AST w/Primary and Secondary Seal	Gasoline	Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
A11	Tank 540	16,320 bbl	Internal Floating Roof AST w/Primary and Secondary Seal	Denatured Ethanol	Gasoline, Diesel, Biodiesel, Transmix, Aviation Gasoline and Jet Fuel

EU	Source ID No.	Rating	Description	Product Stored	Optional Stored Products <sup>1</sup>
A12	Tank 541	25,100 bbl	Domed External Floating Roof AST w/Primary and Secondary Seal	Biodiesel	Gasoline, Diesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
A13	Tank 524	18,000 bbl	Internal Floating Roof AST w/Primary and Secondary Seal	Denatured Ethanol	Gasoline, Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
A14	Tank 542	45,000 bbl	Internal Floating Roof AST w/Primary Seal	Diesel	Biodiesel
A15	Tank 543	35,000 bbl	Internal Floating Roof AST w/Primary Seal	Diesel	Biodiesel
A16	Tank 545	37,000 bbl	Internal Floating Roof AST w/Primary and Secondary Seal	Gasoline	Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
A17	Tank 546	40,000 bbl	Internal Floating Roof AST w/Primary and Secondary Seal	Gasoline	Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
A18	Tank 522	4,000 bbl	Internal Floating Roof AST w/Primary and Secondary Seal	Denatured Ethanol	
A19	Tank 525	50,000 bbl	Fixed Roof AST	Diesel	Biodiesel
A20	Tank 526	50,000 bbl	Fixed Roof AST	Diesel	Biodiesel
A21	Tank 547	50,000 bbl	Internal Floating Roof AST w/Primary and Secondary Seal	Gasoline	Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
A22	Tank 512	50,000 bbl	Fixed Roof AST	Jet Fuel	Diesel and Biodiesel
A23	Tank 510	40,000 bbl	External Floating Roof AST w/Primary Seal	Jet Fuel	Diesel and Biodiesel
A24	Tank 511	40,000 bbl	External Floating Roof AST w/Primary Seal	Jet Fuel	Diesel and Biodiesel
A27	Tank 501	4,000 bbl	Internal Floating Roof AST w/Primary and Secondary Seal	Denatured Ethanol	
A28	Tank 523	10,000 bbl	Internal Floating Roof AST w/Primary and Secondary Seal	Transmix	Gasoline, Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
A29	Tank 544	11,000 bbl	Internal Floating Roof AST w/Primary and Secondary Seal	Denatured Ethanol	Gasoline, Diesel, Biodiesel, Transmix, Aviation Gasoline and Jet Fuel
A45	Tank 548	12,890 bbl	Domed External Floating Roof AST w/Primary and Secondary Seal	Gasoline	Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
A46	Tank 549	12,890 bbl	Domed External Floating Roof AST w/Primary and Secondary Seal	Gasoline	Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel

EU	Source ID No.	Rating	Description	Product Stored	Optional Stored Products <sup>1</sup>
A47	Tank 550	20,000 bbl	Internal Floating Roof AST w/Primary and Secondary Seal	Gasoline	Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
A48	Tank 551	10,100 bbl	Internal Floating Roof AST w/Primary and Secondary Seal	Gasoline	Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
A56	Tank 513	50,000 bbl	Internal Floating Roof AST w/Primary and Secondary Seal	Jet Fuel	Diesel and Biodiesel
A57	Tank 514	50,000 bbl	Internal Floating Roof AST w/Primary and Secondary Seal	Jet Fuel	Diesel and Biodiesel
A58	Tank 553	80,000 bbl	Internal Floating Roof AST w/Primary and Secondary Seal	Gasoline	Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
A59	Tank 554	80,000 bbl	Internal Floating Roof AST w/Primary and Secondary Seal	Diesel	Gasoline, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
A60	Tank 555	80,000 bbl	Internal Floating Roof AST w/Primary and Secondary Seal	Gasoline	Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
A61	Tank 552	40,000 bbl	Internal Floating Roof AST w/Primary and Secondary Seal	Gasoline	Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline and Jet Fuel
B04	Tank 500	3,000 bbl	Internal Floating Roof AST w/Primary and Secondary Seal	Transmix	Gasoline, Diesel, Biodiesel, Denatured Ethanol, Aviation Gasoline and Jet Fuel
B05	Tank 521	5,000 bbl	Internal Floating Roof AST w/Primary and Secondary Seal	Transmix	Gasoline, Diesel, Biodiesel, Denatured Ethanol, Aviation Gasoline and Jet Fuel
<b>Additive Storage Tanks</b>					
A25	ASA Conductivity Improver	1.3 bbl	Fixed Roof AST	Anti-Static Agent (Jet Fuel Additive)	
A26	Tank 500AIA	252 bbl	Fixed Roof AST with Manway	Anti-Icing agent (Jet Fuel Additive)	
A30	Tank 533A	252 bbl	Fixed Roof AST	Gasoline Additive	
A31	Tank 537A	464 bbl	Fixed Roof AST	Gasoline Additive	
A32	Tank 541A	380 bbl	Fixed Roof AST	Gasoline Additive	
A33	Tank 541B	380 bbl	Fixed Roof AST	Gasoline Additive	
A34	Tank 542D	215 bbl	Fixed Roof AST	Gasoline Additive	
A35	Tank 542A	143 bbl	Fixed Roof AST	Gasoline Additive	
A36	Tank 531A	143 bbl	Fixed Roof AST	Lubricity (Diesel Fuel Additive)	
A37	Tank 542C	12 bbl	Fixed Roof AST	Red Dye (Diesel Fuel Additive)	
A38	Tank 537B	447 bbl	Fixed Roof AST	Gasoline Additive	
A39	Tank 531B	119 bbl	Fixed Roof AST	Gasoline Additive	
A49	Tank 542B	4 bbl	Fixed Roof AST	Red Dye (Diesel Fuel Additive)	



EU	Source ID No.	Rating	Description	Product Stored	Optional Stored Products <sup>1</sup>
A53	Tank 548B	238 bbl	Fixed Roof AST	Gasoline Additive	
A54	Tank 548A	238 bbl	Fixed Roof AST	Gasoline Additive	
H10	Tank 500B	10,000 gal	Fixed Roof vertical AST	Anti-Icing Agent (Jet Fuel Additive)	
H14	ASA Tote	350 gal	Fixed Roof Rectangular AST	Anti-static Agent (Jet Fuel Additive)	
H15	CI Tote	350 gal	Fixed Roof Rectangular AST	Corrosion Inhibitor (Jet Fuel Additive)	
H16	Lane 7 Red Dye Tote	350 gal	Fixed Roof Rectangular AST	Red Dye (Diesel Fuel Additive)	
H17	Lane 12 Red Dye Tote	40,000 bbl	Fixed roof Rectangular AST	Red Dye (Diesel Fuel Additive)	
<b>Loading Racks</b>					
B01	Loading Racks	35,379,927 bbl per year	15 Loading Lanes	All Petroleum Products Stored on Site are Dispensed through Loading Racks	
<b>Fuel Unloading</b>					
B01A	B-100	147,168,000 gallons/yr	Biodiesel Offloading Rack		
H09	Ethanol	76,104,000 gal/year	Ethanol unloading system		
<b>Vapor Recovery Units</b>					
B02	John Zink VRU		Vapor control unit; loading lanes		
B10	Flare Processing		Vapor control unit for loading lanes (includes saturator and vapor holding tank)		
SR04	SVE and GW Treatment System		Soil Vapor Extraction and Groundwater Treatment System (includes control units)		
<b>Underground Storage Tanks</b>					
H02	Mainline Sump	1,000 gal	Mainline Sump UST	Gasoline	Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline, and Jet Fuel
H03	Rack Sump	3,000 gal	Rack Sump UST	Gasoline	Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline, and Jet Fuel
H04	Mainline Sump	4,200 gal	New Mainline Sump UST	Gasoline	Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline, and Jet Fuel
H06	Nellis Sump	2,000 gal	Nellis Delivery System Sump, UST	Jet Fuel	
H07	Rack Sump	1,000 gal	Rack 6 Sump, UST	Diesel	Biodiesel
H08	QC Sump	100 gal	Quality Control Lab Sump UST	Gasoline	Diesel, Biodiesel, Denatured Ethanol, Transmix, Aviation Gasoline, and Jet Fuel

EU	Source ID No.	Rating	Description	Product Stored	Optional Stored Products <sup>1</sup>
<b>Miscellaneous Tanks</b>					
D01	Tank DG	250 gal	Fixed Roof AST	Diesel	Biodiesel
H11	OWS Tank		Oil-water separator tank	Oil and Water	
H12	OST-100-DW	1,000 gal	Fixed Roof Horizontal AST w/Dual Wall	Gasoline	
H18	Sample Recovery Tank	125 gallons	Vertical Fixed Roof Sample Recovery Tank	Pre-butane Blended Gasoline	
<b>Miscellaneous Emission Units</b>					
B06	Piping and Fittings		Misc. Losses/Leaks from Valves, Flanges, Pumps and VCU		
E01	Haul Road - Paved	0.5 mi round trip	Paved Haul Road		
	Haul Road - Unpaved	0.71 mi round trip	Unpaved Haul Road		
H05	Cooling Tower	220 gpm	Baltimore Aircoil; M/N: F2841KE; S/N: U013422001MAD		

<sup>1</sup>The PTE and rule applicability is based on worse-case configuration

**Table 1-2: List of Emission Units - Engines**

<b>Internal Combustion Engines</b>					
EU	Rating	Description	Manufacturer	Model Number	Serial Number
B11	48 hp	Air Compressor	Ingersoll Rand	P185WJD	315261UHK231
		Diesel Engine; DOM: 2000	John Deere	4045DF150F	PE4045D107913
D02	208 hp	Diesel Engine (engine to Peerless fire pump); DOM 4/20/1995	Cummins	6BTA5.9-F1	45175100

## 1.2 INSIGNIFICANT ACTIVITIES

The units in Table 1-3 are present at this source but are insignificant activities pursuant to AQR 12.5.2.5. The emissions from these units or activities, when added to the PTE of the source, will not make the source major for any additional pollutant.

**Table 1-3: Summary of Insignificant Activities**

<b>Equipment</b>	<b>Description</b>
Tank 476	Wastewater
Tank 479	Free Product Extracted from Wells of the Groundwater System
Tank 535-A	Diesel Lubricity Additive Storage Tank, 10,000 gallons, 0.026 psia
Underground Storage Tanks (2)	Wastewater Runoff Collection
B-100 Prover	Portable Prover for B-100 fuel
Nellis Line Prover	Horizontal Loop Piping Circuit
Main Line Prover	Horizontal Loop Piping Circuit
Water Surge Tank	Wastewater Treatment (Oil and Water Separator)
Parts Washer	R&D Fountain Industries Company; 3.5 Gallon Tub; 35"W x 24"L x 17"D
Evaporation Tank/Pond	Wastewater Evaporation
Butane Blending Tank	90,000-gallon horizontal pressurized tank storing butane

### **1.3 NONROAD ENGINES**

Pursuant to Title 40, Part 1068.30 of the Code of Federal Regulations (40 CFR Part 1068.30), nonroad engines that are portable or transportable (i.e., not used on self-propelled equipment) shall not remain at a location for more than 12 consecutive months; otherwise, the engine(s) will constitute a stationary reciprocating internal combustion engine (RICE) and be subject to the applicable requirements of 40 CFR Part 63, Subpart ZZZZ; 40 CFR Part 60, Subpart IIII; and/or 40 CFR Part 60, Subpart JJJJ. Stationary RICE shall be permitted as emission units upon commencing operation at this stationary source.

Records of location changes for portable or transportable nonroad engines shall be maintained and shall be made available to the Control Officer upon request. These records are not required for engines owned and operated by a contractor for maintenance and construction activities as long as records are maintained demonstrating that such work took place at the stationary source for periods of less than 12 consecutive months.

Nonroad engines used on self-propelled equipment do not have this 12-month limitation or the associated recordkeeping requirements.

## 2.0 CONTROLS

### 2.1 CONTROL DEVICES

#### Storage Tanks

- The permittee shall maintain and operate the fuel storage tanks and the fuel additive tanks according to the control requirements, as listed in Table 2-1 (where fixed roof is identified, no additional controls are included). *[NSR ATC/OP 13, Modification 6 (03/29/2004)]*

**Table 2-1: Tank Control Requirements**

EU	Facility ID	Device Type	Applicable Requirement(s)
A01	530	External Floating Roof with primary and secondary seals	40 CFR Part 63, Subparts BBBB and WW
A02	531	External Floating Roof with primary and secondary seals	40 CFR Part 63, Subparts BBBB and WW
A03	532	External Floating Roof with primary and secondary seals	40 CFR Part 63, Subparts BBBB and WW
A04	533	External Floating Roof with primary and secondary seals	40 CFR Part 63, Subparts BBBB and WW
A05	534	External Floating Roof with primary and secondary seals	40 CFR Part 63, Subparts BBBB and WW
A06	535	External Floating Roof with primary and secondary seals	40 CFR Part 63, Subparts BBBB and WW
A07	536	External Floating Roof with primary and secondary seals	40 CFR Part 63, Subparts BBBB and WW
A08	537	External Floating Roof with primary and secondary seals	40 CFR Part 63, Subparts BBBB and WW
A09	538	External Floating Roof with primary and secondary seals	40 CFR Part 63, Subparts BBBB and WW
A10	539	External Floating Roof with primary and secondary seals	40 CFR Part 63, Subparts BBBB and WW
A11	540	Internal Floating Roof with primary and secondary seals	40 CFR Part 63, Subparts BBBB and WW
A12	541	Domed External Floating Roof with primary and secondary seals	40 CFR Part 63, Subparts BBBB and WW
A13	524	Internal Floating Roof with primary and secondary seals	40 CFR Part 63, Subparts BBBB and WW
A14	542	Internal Floating Roof, primary Seal	
A15	543	Internal Floating Roof, primary Seal	
A16	545	Internal Floating Roof with primary and secondary seals	40 CFR 60, Subpart Kb; 40 CFR Part 63, Subparts BBBB and WW
A17	546	Internal Floating Roof, with primary and secondary seals	40 CFR 60, Subpart Kb; 40 CFR Part 63, Subparts BBBB and WW

EU	Facility ID	Device Type	Applicable Requirement(s)
A18	522	Internal Floating Roof, with primary and secondary seals	
A19	525	Fixed Roof	
A20	526	Fixed Roof	
A21	547	Internal Floating Roof with primary and secondary seals	40 CFR Part 60, Subpart Kb; 40 CFR Part 63, Subparts BBBB and WW
A22	512	Fixed Roof	
A23	510	External Floating Roof, primary seal	
A24	511	External Floating Roof, primary seal	
A25	ASA Conductivity Improver	Fixed Roof	
A26	500 AIA	Fixed Roof	
A27	501	Internal Floating Roof, primary and secondary seals	
A28	523	Internal Floating Roof with primary and secondary seals	40 CFR Part 63, Subparts BBBB and WW
A29	544	Internal Floating Roof with primary and secondary seals	40 CFR Part 60, Subpart Ka; 40 CFR Part 63, Subparts BBBB and WW
A30	533 A	Fixed Roof	
A31	537 A	Fixed Roof	
A32	541 A	Fixed Roof	
A33	541 B	Fixed Roof	
A34	542D	Fixed Roof	
A35	542A	Fixed Roof	
A36	531A	Fixed Roof	
A37	542C	Fixed Roof	
A38	537 B	Fixed Roof	
A39	531B	Fixed Roof	
A45	548	Domed External Floating Roof with primary and secondary seals	40 CFR Part 63, Subparts BBBB and WW
A46	549	Domed External Floating Roof with primary and secondary seals	40 CFR Part 63, Subparts BBBB and WW
A47	550	Internal Floating Roof with primary and secondary seals	40 CFR Part 63, Subparts BBBB and WW
A48	551	Internal Floating Roof with primary and secondary seals	40 CFR Part 63, Subparts BBBB and WW
A49	542B	Fixed Roof	
A53	548B	Fixed Roof	
A54	548A	Fixed Roof	
A56	513	Internal Floating Roof with primary and secondary seals	

EU	Facility ID	Device Type	Applicable Requirement(s)
A57	514	Internal Floating Roof, with primary and secondary seals	
A58	553	Internal Floating Roof with primary and secondary seals	40 CFR Part 60, Subpart 60 Kb; 40 CFR Part 63, Subparts BBBBBB and WW
A59	554	Internal Floating Roof with primary and secondary seals	40 CFR Part 60, Subpart 60 Kb; 40 CFR Part 63, Subparts BBBBBB and WW
A60	555	Internal Floating Roof with primary and secondary seals	40 CFR Part 60, Subpart 60 Kb; 40 CFR Part 63, Subparts BBBBBB and WW
A61	552	Internal Floating Roof with primary and secondary seals	40 CFR Part 60, Subpart 60 Kb; 40 CFR Part 63, Subparts BBBBBB and WW
B04	500	Internal Floating Roof with primary and secondary seals	40 CFR Part 60, Subpart 60 Kb; 40 CFR Part 63, Subparts BBBBBB and WW
B05	521	Internal Floating Roof with primary and secondary seals	40 CFR Part 60, Subpart 60 Kb; 40 CFR Part 63, Subparts BBBBBB and WW
D01	DG	Fixed Roof	
H02	Mainline sump	Fixed Roof UST with vent	
H03	Rack sump	Fixed Roof UST with vent	
H04	New Mainline sump	Fixed Roof UST with vent	
H06	Nellis sump	Fixed Roof UST with vent	
H07	Rack sump	Fixed Roof UST with vent	
H08	QC sump	Fixed Roof UST with vent	
H10	Tank 500B	AST VFR tank	
H11	OWS tank	AST Tank with P/V valves and carbon adsorption unit with 95% control efficiency	
H12	OST-1200-DW	Dual wall HFR AST with P/V valves and carbon adsorption unit with 95% control efficiency	
H14	ASA Tote	Rectangular AST, fixed roof	
H15	CI Tote	Rectangular AST, fixed roof	
H16	Lane 7 Red Dye Tote	Rectangular AST, fixed roof	
H17	Lane 12 Red Dye Tote	Rectangular AST, fixed roof	
H18	Sample Recovery Tank	Vertical Fixed Roof Sample Recovery Tank	

### Sump Tanks, Oil Water Separator, and Oil Storage Tank

2. The permittee shall control the vapors from the oil/water separator tank (OWS) (EU: H11) and the oil storage tank (EU: H12) by venting the vapors to a carbon adsorption system that has a minimum control efficiency of 95.0%. *[NSR ATC 13, Modification 21, Condition IV-B-5 (08/30/2010)]*

### Loading Racks: Vapor Recovery Unit

3. The permittee shall use as the primary control device the John Zink Series 2000 high-efficiency adsorption-absorption hydrocarbon vapor recovery unit [JZVRU (EU: B02)] for all captured VOC loading rack emissions. *[NSR ATC/OP 13, Modification 6, Condition III-A-2 (03/29/2004) and 40 CFR Part 60, Subpart XX]*

### Loading Racks: Auxiliary Flare

4. The permittee shall use the auxiliary flare (EU: B10) at all times the JZVRU is inoperable to control VOC loading rack emissions. The flare shall operate only during documented malfunctions, documented emergencies, or maintenance events of the JZVRU. *[NSR ATC/OP 13, Modification 6, Condition III-A-3 (03/29/2004)]*

### Offloading Rack B-100 Fuel (EU: B01A)

5. The permittee shall only offload B-100 from tank trucks that are equipped with a vapor recovery collection system compatible with the terminal's vapor balance system. *[AQR 12.5.2.6(a) & (b)]*

### Soil Vapor Extraction and Groundwater Treatment System (EU: SR04)

6. The permittee shall use a control device capable of 98.5 percent VOC destruction efficiency when the permittee operates a combustion unit for controlling VOC emissions from the soil vapor extraction and groundwater treatment system. *[NSR ATC/OP 13, Modification 6, Condition III-A-23 (03/29/2004)]*

## **2.2 CONTROL REQUIREMENTS**

### General Requirements

1. The permittee shall comply with all applicable control requirements of 40 CFR Part 60, Subparts A, Ka, Kb, and XX; 40 CFR Part 80; and 40 CFR Part 63, Subparts A, WW, and BBBB. *[NSR ATC/OP 13, Modification 6, Condition III-A-1 (03/29/2004)]*
2. Each gasoline storage tank is deemed in compliance with 40 CFR Part 63, Subpart BBBB, if that tank is subject to, and complies with, the control requirements of 40 CFR Part 60, Subpart Kb (EUs: A16, A17, A21, A58–A61, B04, and B05). *[40 CFR Part 63.11087(f)]*
3. The permittee shall take, but is not limited to, the following measures to minimize vapor releases to the atmosphere (EUs: A01-A13, A16, A17, A21, A28, A29, A45-A48, A58-A61, B04, and B05): *[NSR ATC/OP 13, Modification 6, Condition III-B-16 (03/29/2004) and 40 CFR Part 63.11086(d)]*

- a. Minimize gasoline spills;
- b. Clean up spills as expeditiously as possible;
- c. Cover all open gasoline containers with a gasketed seal when not in use; and
- d. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

### Storage Tanks

4. The permittee shall comply with the applicable requirements for gasoline storage tanks, gasoline loading racks, vapor collection-equipped gasoline cargo tanks, and equipment
5. For gasoline storage tanks with a capacity of 75 m<sup>3</sup> or greater (EUs: A01-A13, A16, A17, A21, A28, A29, A45–A48, A58–A61, B04, and B05), the permittee shall:
  - a. Equip and operate each internal and external floating roof gasoline storage tank according to the applicable requirements in 40 CFR Part 63.1063(a)(1) & (b), except for the secondary seal requirements under 63.163(a)(1)(i)(C) & (D), and equip each external floating roof gasoline storage tank according to the requirements of 40 CFR Part 63.1063(a)(s) if that tank does not currently meet the requirements of 63.1063(a)(1).
6. The permittee shall apply the provisions of 40 CFR Part 63, Subpart WW for controlling air emissions from storage vessels, as referenced in 40 CFR Part 60, Subpart Kb. (EUs: A16, A17, A21, and A58-A61, B04, and B05). *[40 CFR Part 63, Subpart 63.1060]*
7. The permittee shall operate and maintain each storage vessel to which 40 CFR Part 63, Subpart WW applies with a floating roof in accordance with 40 CFR Part 63.1063 (EUs: A01-A13, A16, A17, A21, A28, A29, A45-A48, A58-A61, B04, and B05). *[40 CFR Part 63, Subpart 63.1062]*
8. The permittee shall limit the Reid vapor pressure (RVP) of all combined fuel products stored in each bulk storage tank listed in Table 3-1 to an annual average of 11. The 12-month rolling average RVP limit will not apply to a storage tank that is not in service for any consecutive 12 months. *[NSR ATC/OP 13, Modification 6, Condition III-B-18 (03/29/2004)]*
9. The permittee shall limit each storage tank to the product(s) noted for it in Table 1-1. *[NSR ATC/OP 13, Modification 6, Condition III-B-17 (03/29/2004)]*

### Sump Tanks, Oil/Water Separator, and Oil Storage Tank

10. The permittee shall keep all hatches and other openings on the OWS (EU: H11) and the oil storage tank (EU: H12) gasketed and closed at all times except when opened for active inspection, maintenance, sampling, gauging, or repair. *[NSR ATC 13, Modification 21, Condition IV-B-6 (08/30/2010)]*



11. The permittee shall operate and maintain all vents on the OWS (EU: H11) and the oil storage tank (EU: H12) with pressure/vacuum relief valves. The vents on the sumps (EUs: H02, H03, H04, H06, H07, and H08) are not required to be equipped with pressure/vacuum relief valves. *[NSR ATC 13, Modification 21, Condition IV-B-7 (08/30/2010)]*

#### Loading Racks: Vapor Collection System

12. The permittee shall limit the loading of gasoline into vapor-tight gasoline cargo tanks (tank trucks). *[40 CFR Part 60.502(e)]*
13. The permittee shall operate the JZVRU during all product loading unless there is a documented malfunction, documented emergency, or maintenance event with the JZVRU (EU: B02). *[NSR ATC/OP 13, Modification 6, Condition III-A-2 (03/29/2004) and 40 CFR Part 60, Subpart XX]*
14. The permittee shall maintain and operate the vapor collection and liquid loading equipment to limit gauge pressure in the delivery tank to 4,500 pascals (450 mm of water) during product loading. The pressure shall be measured by the procedures specified in 40 CFR Part 60.503(d) (EU: B02). *[NSR ATC/OP 13, Modification 6, Condition III-A-6 (03/29/2004) and 40 CFR Part 60.502(h)]*
15. The permittee shall maintain and operate the vapor collection system such that the pressure vacuum vents do not open if the system pressure is less than 4,500 pascals (450 mm of water) (EU: B02). *[40 CFR Part 60.502(i) and NSR ATC/OP 13, Modification 6, Condition III-A-7 (03/29/2004)]*
16. The permittee shall maintain and operate the JZVRU (EU: B02) per the operation and maintenance (O&M) manual. *[NSR ATC/OP 13, Modification 6, Condition III-E-3 (03/29/04)]*
17. The permittee shall design and operate the vapor collection system to prevent any vapors collected at one loading rack or lane from passing through another loading rack or lane to the atmosphere. *[40 CFR Part 60.502(d)]*

#### Loading Racks: Auxiliary Flare

18. The permittee shall use the auxiliary flare (EU: B10) at all times the JZVRU is inoperable to control VOC loading rack emissions. The flare shall operate only during a documented malfunction, documented emergencies, or JZVRU maintenance events. *[NSR ATC/OP 13, Modification 6, Condition III-A-3 (03/29/2004)]*
19. The permittee shall operate the flare (EU: B10) so that it utilizes a flame scanner/sensor and immediately shuts down operations if flame instability is detected. Only trucks loading prior to a flare shutdown shall be allowed to finish product loading, and then only if vapor holder capacity exists. Once the permittee has determined, documented, and repaired the cause of the flame instability, product loading of tanker trucks may resume with the flare being used as the control device. *[NSR ATC/OP 13, Modification 6, Condition III-A-5 (03/29/2004)]*

### Loading Racks: Tanker Loading Requirements

20. The permittee shall follow all regulatory requirements related to fuel handling to minimize vapor releases to the atmosphere. *[NSR ATC/OP 13, Modification 6, Condition III-B-16 (03/29/2004)]*
21. The permittee shall assure that any non-vapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained. *[40 CFR Part 60.502(e)(5) and NSR ATC/OP 13, Modification 6, Condition III-A-8 (03/29/2004)]*
22. The permittee shall only load tank trucks when the terminals and the tank truck's vapor collection systems are connected. *[40 CFR 60.502(g) and NSR ATC/OP 13, Modification 6, Condition III-B-9 (03/29/2004)]*
23. The permittee shall only load gasoline into tank trucks equipped with vapor collection equipment compatible with the terminal's vapor collection system. *[40 CFR Part 60.502(f) and NSR ATC/OP 13, Modification 6, Condition III-B-9 (03/29/2004)]*

### Ethanol Unloading System

24. The permittee shall vent the vapors from the ethanol unloading system (EU: H09) to the existing VRU (EU: B02). *[NSR ATC 13, Modification 21, Condition IV-B-4 (08/30/2010)]*

### Offloading Rack B-100 Fuel

25. The permittee shall ensure that only trucks with a current vapor tightness certification are offloaded from the B-100 offloading rack (EU: B01A). *[AQR 12.5.2.6(a) & (b)]*
26. The permittee shall only offload B-100 from tank trucks equipped with a vapor collection system compatible with the terminal's vapor balance system. *[AQR 12.5.2.6(a) & (b)]*
27. The permittee shall only offload B-100 from tank trucks when all vapor balance system equipment is connected and operating (EU: B01A). *[AQR 12.5.2.6(a) & (b)]*

### Haul Roads

28. The permittee shall maintain onsite haul roads, including roads providing exclusive access, by immediately removing road debris and mud or dirt trackout. Maintenance may consist of washing, sweeping, vacuuming, or equivalent control measures (EU: E01). *[NSR ATC/OP 13, Modification 6, Condition III-A-27 (03/29/2004) and AQR 12.5.2.6(a)]*
29. Unpaved roads accessing or located on the site shall be treated with a chemical or organic dust suppressant and watered as necessary to keep from exhibiting an opacity greater than 20% for more than 3 minutes in any 60-minute period. Silt content shall not exceed 6% and silt loading shall not exceed 0.33 oz/ft<sup>2</sup>, regardless of the average number of vehicles per day. *[NSR ATC/OP, Modification 6, Condition 28 3/29/2004]*

### Soil Vapor Extraction and Groundwater Treatment System

30. The permittee shall use a control device capable of 98.5% VOC destruction efficiency when operating a combustion unit to control VOC emissions from the soil vapor extraction or groundwater treatment system. *[NSR ATC/OP 13, Modification 6, Condition III-B-23 (03/29/2004)]*
  - a. The permittee shall use only propane as the auxiliary fuel when operating the combustion unit (EU: SR04). *[NSR ATC/OP 13, Modification 6, Condition III-A-5 (03/29/2004)]*
  - b. The permittee shall operate and maintain the combustion unit according to the O&M manual (EU: SR04). *[NSR ATC/OP 13, Modification 6, Condition III-A-7 (03/29/2004)]*
  - c. The permittee shall operate the combustion unit at a temperature specified by the manufacturer (EU: SR04). *[NSR ATC/OP Section III-B, Condition 26 (3/29/2004), AQR 12.5.2.6]*
31. The permittee shall demonstrate a minimum control efficiency of 95% or a maximum outlet emission concentration of 100 ppmvd of VOC if a vapor-phase carbon adsorber is used for emission control of the soil vapor extraction or groundwater treatment system (EU: SR04). *[AQR 12.5.2.6(a)]*

### Cooling Tower

32. The permittee shall equip the cooling tower (EU: H05) with drift eliminators that have a maximum drift rate of 0.001%. *[NSR ATC 13, Modification 21, Condition IV-B-1 (08/30/2010)]*
33. The permittee shall not allow the total dissolved solids (TDS) of the cooling tower (EU: H05) to exceed 2,000 ppm. *[NSR ATC 13, Modification 21, Condition IV-B-2 (08/30/2010)]*
34. The permittee shall operate and maintain the cooling tower (EU: H05) in accordance with the O&M manual. *[NSR ATC 13, Modification 21, Condition IV-B-3 (08/30/2010)]*

### Engines/Air Compressor/Fire Water Engine

35. The permittee shall operate and maintain each diesel engine in accordance with the O&M manual (EUs: B11 and D02). *[AQR 12.5.2.6(a)]*
36. The permittee shall maintain the diesel-powered air compressor (EU: B11) as follows unless O&M manual requirements are more stringent: *[40 CFR Part 63.6603]*
  - a. Change oil and filter every 1,000 hours of operation or annually, whichever comes first;
  - b. Inspect air cleaners every 1,000 hours of operation or annually, whichever comes first;  
and

- c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. (The permittee may use an oil analysis program, as described in 40 CFR Part 63.6625(i), to extend the specified oil change requirement and petition the Control Officer on alternative work practices pursuant to the requirements of 40 CFR Part 63.6(g)).
  - d. During startup, the permittee shall minimize engine time spent at idle. The permittee shall minimize engine startup time to a period needed for appropriate and safe engine loading, not to exceed 30 minutes, after which time all non-startup emission limitations apply. *[40 CFR Part 63.6603(a)]*
37. The permittee shall maintain the diesel-powered fire water engine (EU: D02) as follows, unless the O&M manual are more stringent: *[40 CFR Part 63, Subpart 63.6603]*
- a. Change oil and filter every 500 hours of operation or annually, whichever comes first;
  - b. Inspect air cleaners every 1,000 hours of operation or annually, whichever comes first; and
  - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. (The permittee may utilize an oil analysis program as described in Subpart 63.6625(i) to extend the specified oil change requirement and can petition the Control Officer pursuant to the requirements of 40 CFR Part 63.6(g) for alternative work practices.)

Other

38. The permittee shall not cause or allow the handling, transporting, or storage of any material in a manner that may or does allow controllable particulate matter to become airborne. *[AQR 41.1.2]*

### 3.0 LIMITATIONS AND STANDARDS

#### 3.1 OPERATIONAL LIMITS

##### General

1. The permittee may comply with 40 CFR Part 63, Subpart WW to satisfy the compliance requirements of 40 CFR Part 60, Subpart Kb (EUs: A16, A17, A21, A58-A61, B04, and B05). [40 CFR Part 60.110b(e)(5)]

##### Storage Tanks

2. The permittee shall limit the total annual tank throughput of all tanks identified in Table 3-1 to 4,504,505,338 gallons (107,250,172 barrels) in any consecutive 12-month period. [NSR ATC/OP (all modifications) and AQR 12.5]
3. The permittee shall limit the throughput of individual tanks to the amounts identified in Table 3-1 in any consecutive 12-month period. [NSR ATC/OP 13, Modification 6, Condition III-A-3 (03/29/2004)]

**Table 3-1: Storage Tank Throughputs (in gallons)**

EU	Annual Throughput (gallons)	EU	Annual Throughput (gallons)
<b>Bulk Storage Tanks</b>			
A01	28,560,000	A27	9,540,000
A02	32,460,000	A28	23,580,000
A03	20,340,000	A29	27,720,000
A04	28,560,000	A45	32,460,000
A05	20,340,000	A46	32,460,000
A06	20,340,000	A47	70,000,000
A07	44,220,000	A48	50,400,000
A08	90,000,000	A56	189,000,000
A09	28,560,000	A57	189,000,000
A10	50,000,000	A58	302,400,000
A11	137,000,000	A59	604,800,000
A12	864,000,000	A60	604,800,000
A13	50,760,000	A61	126,000,000
A14	118,500,000	B04	7,560,000
A15	114,660,000	B05	12,720,000
A16	88,200,000	D01	25,000
A17	100,800,000	H02	302,400
A18	9,000,000	H03	806,400
A19	350,000,000	H04	100,800
A20	220,500,000	H06	75,600

EU	Annual Throughput (gallons)	EU	Annual Throughput (gallons)
A21	100,800,000	H07	36,000
A22	126,000,000	H08	7,200
A23	100,800,000	H11	15,768,000
A24	100,800,000	H12	365,000
<b>Fuel Additive Tanks</b>			
A25	5,040	A38	95,949
A26	95,949	A39	44,100
A30	95,949	A49	5,040
A31	95,949	A53	57,519
A32	148,050	A54	95,949
A33	148,050	H10	132,000
A34	81,207	H14	390
A35	79,286	H15	3,300
A36	55,661	H16	6,150
A37	5,040	H17	6,150
		H18	13,000

4. The permittee shall operate each storage tank so that the floating roof floats on the stored liquid surface at all times except when supported by its legs or other support devices (EUs: A01–A13, A16, A17, A21, A28, A29, A45–A48, A58–A61, B04, and B05). *[40 CFR Part 63.1063(b)]*
5. If the liquid depth in a storage tank is insufficient to support the floating roof, the permittee shall fill the tank continuously as soon as practical until the roof refloats (EUs: A01–A13, A16, A17, A21, A28, A29, A45–A48, A58–A61, B04, and B05). *[40 CFR Part 63.1063(b)]*
6. The permittee shall keep each opening in the floating roof covered at all times except automatic bleeder (vacuum breaker) and rim space vents, and except when the cover must be open for access (EUs: A01–A13, A16, A17, A21, A28, A29, A45–A48, A58–A61, B04, and B05). *[40 CFR Part 63.1063(b)]*
7. The permittee shall keep each automatic bleeder (vacuum breaker) and rim space vent closed at all times except to relieve excess pressure or vacuum in accordance with the O&M manual (EUs: A01–A13, A16, A17, A21, A28, A29, A45–A48, A58–A61, B04, and B05). *[40 CFR Part 63.1063(b)]*
8. The permittee shall keep each unslotted guide pole cap closed at all times except when gauging the liquid level or taking liquid samples (EUs: A01–A13, A16, A17, A21, A28, A29, A45–A48, A58–A61, B04, and B05). *[40 CFR Part 63.1063(b)]*

### Loading Racks

9. The permittee shall limit the total throughput of all petroleum products to the loading racks (EU: B01) to 1,485,956,934 gallons (35,379,927 barrels) in any consecutive 12-month period. *[NSR ATC/OP 13, Modification 6, Condition III-A-2 (03/29/2004)]*

10. The permittee shall limit the total throughput of gasoline to the two loading racks and 15 lanes (EU: B01) to 977,278,302 gallons (23,268,531 barrels) in any consecutive 12-month period. *[NSR ATC/OP 13, Modification 6, Condition III-A-2 (03/29/2004)]*

#### Offloading Rack

11. The permittee shall limit total throughput of the B-100 offloading rack (EU: B01A) to 147,168,000 gallons in any consecutive 12-month period. *[Part 70 OP, Condition III-B-2(e) (12/20/2012)]*

#### Loading Racks: Auxiliary Flare

12. The permittee shall limit operation of the auxiliary flare (EU: B10) to 438 hours in any consecutive 12-month period. *[NSR ATC/OP 13, Modification 6, Condition III-A-4 (03/29/2004)]*

#### Ethanol Unloading System

13. The permittee shall limit the amount of ethanol unloaded through the ethanol loading system (EU: H09) to 76,104,000 gallons in any consecutive 12-month period. *[NSR ATC 13, Modification 21, Condition IV-2-b (08/31/2010)]*

#### Haul Roads

14. The permittee shall limit the vehicle miles traveled per year on unpaved roads (EU: E01) to 5,457 miles. *[Title V OP Application (11/13/2024), AQR 12.1.4.1(c)&(f)]*
15. The permittee shall limit the vehicle miles traveled per year on paved roads (EU: E01) to 99,630 miles. *[Title V OP January 29, 2024, AQR 12.1.4.1(c)&(f)]*

#### Engines/Air Compressor/Fire Water Engine

16. The permittee shall limit operation of the diesel-powered air compressor to 100 hours per year (EU: B11). *[Part 70 OP, Condition III-B-2(n) (09/23/2014)]*
17. The permittee shall limit operation of the diesel-powered fire water engine (EU: D02) for testing and maintenance purposes to 100 hours per year. The permittee may operate the fire water engine up to 50 hours per year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. *[40 CFR Part 63.6640]*

### **3.2 EMISSION LIMITS**

#### General

1. The permittee shall not allow the actual emissions from the stationary source to exceed the PTE listed in Table 3-2 in any consecutive 12-month period, except for emission units intended only for use in emergencies. *[AQR 12.5.2.6(a)]*

**Table 3-2. Potential to Emit (tons per year)**

Pollutant	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	H <sub>2</sub> S	Pb
<b>Total</b>	9.85	1.58	<b>3.26</b>	<b>2.55</b>	<b>0.18</b>	<b>188.0</b>	0	0

2. The permittee shall not allow the actual emissions from the following individual emission units to exceed the PTE listed in Table 3-3 in any consecutive 12-month period, except for emission units intended only for use in emergencies. [AQR 12.5.2.6(a)]

**Table 3-3. PTE Summary—Emissions by Unit (tons per year)**

EU	Source ID No.	Condition (gal/yr)	PTE (tpy)						
			PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAP
A01	Tank 530	28,560,000	0	0	0	0	0	1.33	0.07
A02	Tank 531	32,460,000	0	0	0	0	0	1.41	0.07
A03	Tank 532	20,340,000	0	0	0	0	0	1.14	0.06
A04	Tank 533	28,560,000	0	0	0	0	0	1.33	0.07
A05	Tank 534	20,340,000	0	0	0	0	0	1.14	0.06
A06	Tank 535	20,340,000	0	0	0	0	0	1.14	0.06
A07	Tank 536	44,220,000	0	0	0	0	0	1.64	0.09
A08	Tank 537	90,000,000	0	0	0	0	0	1.88	0.10
A09	Tank 538	28,560,000	0	0	0	0	0	2.76	0.14
A10	Tank 539	50,000,000	0	0	0	0	0	1.38	0.07
A11	Tank 540	137,000,000	0	0	0	0	0	1.90	0.10
A12	Tank 541	864,000,000	0	0	0	0	0	1.61	0.08
A13	Tank 524	50,760,000	0	0	0	0	0	0.75	0.04
A14	Tank 542	118,500,000	0	0	0	0	0	0.17	0.01
A15	Tank 543	114,660,000	0	0	0	0	0	0.18	0.01
A16	Tank 545	88,200,000	0	0	0	0	0	2.14	0.11
A17	Tank 546	100,800,000	0	0	0	0	0	2.94	0.15
A18	Tank 522	9,000,000	0	0	0	0	0	0.28	0.01
A19	Tank 525	350,000,000	0	0	0	0	0	1.84	0.01
A20	Tank 526	220,500,000	0	0	0	0	0	1.47	0.01
A21	Tank 547	100,800,000	0	0	0	0	0	2.58	0.14
A22	Tank 512	126,000,000	0	0	0	0	0	1.77	0.01
A23	Tank 510	100,800,000	0	0	0	0	0	0.18	0.01
A24	Tank 511	100,800,000	0	0	0	0	0	0.18	0.01
A27	Tank 501	9,540,000	0	0	0	0	0	0.32	0.01
A28	Tank 523	23,580,000	0	0	0	0	0	1.53	0.08
A29	Tank 544	27,720,000	0	0	0	0	0	1.72	0.09
A45	Tank 548	32,460,000	0	0	0	0	0	1.85	0.10
A46	Tank 549	32,460,000	0	0	0	0	0	1.04	0.05
A47	Tank 550	70,000,000	0	0	0	0	0	1.81	0.09



EU	Source ID No.	Condition (gal/yr)	PTE (tpy)						
			PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAP
A48	Tank 551	50,400,000	0	0	0	0	0	1.75	0.09
A56	Tank 513	189,000,000	0	0	0	0	0	0.23	0.01
A57	Tank 514	189,000,000	0	0	0	0	0	0.23	0.01
A58	Tank 553	302,400,000	0	0	0	0	0	4.29	0.23
A59	Tank 554	604,800,000	0	0	0	0	0	4.98	0.26
A60	Tank 555	604,800,000	0	0	0	0	0	3.41	0.18
A61	Tank 552	126,000,000	0	0	0	0	0	2.26	0.12
B04	Tank 500	7,560,000	0	0	0	0	0	0.55	0.03
B05	Tank 521	12,720,000	0	0	0	0	0	1.24	0.06
A25	ASA Conductivity Improver	5,040	0	0	0	0	0	0.01	0.01
A26	Tank 500AIA	95,949	0	0	0	0	0	0.01	0.01
A30	Tank 533A	95,949	0	0	0	0	0	0.02	0.01
A31	Tank 537A	95,949	0	0	0	0	0	0.02	0.01
A32	Tank 541A	148,050	0	0	0	0	0	0.02	0.01
A33	541B	148,050	0	0	0	0	0	0.02	0.01
A34	542D	81,207	0	0	0	0	0	0.02	0.01
A35	542A	79,286	0	0	0	0	0	0.02	0.01
A36	531A	55,661	0	0	0	0	0	0.01	0.01
A37	542C	5,040	0	0	0	0	0	0.01	0.01
A38	537B	95,949	0	0	0	0	0	0.03	0.01
A39	531B	44,100	0	0	0	0	0	0.01	0.01
A49	542B	5,040	0	0	0	0	0	0.01	0.01
A53	548B	57,519	0	0	0	0	0	0.02	0.01
A54	548A	95,949	0	0	0	0	0	0.03	0.01
H10	500B	132,000	0	0	0	0	0	0.01	0.01
H14	ASA Tote	390	0	0	0	0	0	0.01	0.01
H15	CI Tote	3,300	0	0	0	0	0	0.01	0.01
H16	Lane 7 Red Dye Tote	6,150	0	0	0	0	0	0.01	0.01
H17	Lane 12 Red Dye Tote	6,150	0	0	0	0	0	0.01	0.01
H18	Sample Recovery Tank	13,000	0	0	0	0	0	0.34	0.03
B01	Loading Racks	Emissions included in B10							
B01A	B-100	147,168,000	0	0	0	0	0	0.04	0.01
H09	Ethanol Unloading System	76,104,000	0	0	0	0	0	0.18	0.01
B02	John Zink VRU	1,485,776,586	0	0	0	0	0	14.48	0.72

EU	Source ID No.	Condition (gal/yr)	PTE (tpy)						
			PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAP
B10	Flare Processing	498,843.57 lb/yr	0.04	0.04	0.32	1.45	0.15	65.71	3.11
SR04	SVE and GW Treatment System	8,760 hr/yr	0.07	0.07	1.26	0.73	0.01	37.67	1.78
H02	Mainline Sump	302,400	0	0	0	0	0	0.41	0.02
H03	Rack Sump	806,400	0	0	0	0	0	1.13	0.06
H04	Mainline Sump	100,800	0	0	0	0	0	0.51	0.03
H06	Waste Fuel	75,600	0	0	0	0	0	0.01	0.01
H07	Waste Fuel	36,000	0	0	0	0	0	0.01	0.01
H08	Waste Fuel	7,200	0	0	0	0	0	0.02	0.01
D01	Diesel/Biodiesel	25,000	0	0	0	0	0	0.01	0.01
H11	Oil/Water Separator	15,768,000	0	0	0	0	0	0.08	0.01
H12	Waste Fuel/Oil/Water	365,000	0	0	0	0	0	0.04	0.01
B06	Piping and Fittings	21,888	0	0	0	0	0	6.56	0.35
E01	Haul Road - Paved	99,630 VMT/yr	7.54	1.14	0	0	0	0	0
	Haul Road – Unpaved	5,457 VMT/yr	2.07	0.21	0	0	0	0	0
H05	Cooling Tower	8,760 hr/yr	0.01	0	0	0	0	0	0
B11	Air Compressor	100 hr/yr	0.01	0.01	0.07	0.02	0.01	0.01	0.01
D02	Fire Water Engine	500 hr/yr	0.11	0.11	1.61	0.35	0.01	0.13	0.01

Note: VMT = vehicle miles traveled.

- The permittee shall at all times operate and maintain the storage tanks, gasoline loading racks, vapor collection-equipped gasoline cargo tanks, equipment components in vapor or liquid gasoline service, and monitoring equipment in a manner consistent with safety and with good air pollution control practices for minimizing emissions [40 CFR Part 63.11085(a)]

#### Vapor Recovery Unit

- The permittee shall not allow the actual emissions from the JZVRU (EU: B02) to exceed 2.4 mg of total VOC per liter of gasoline (0.02 lb/1,000 gal of product loaded) over a four-hour average. [NSR ATC/OP 13, Modification 6, Condition III-A-26 (03/29/04)]

#### Soil Vapor Extraction and Ground Water Treatment System

- The permittee shall operate the soil vapor extraction and groundwater treatment system (EU: SR04) so that emissions to the atmosphere do not contain visible black or white smoke while the combustion unit is operating. [NSR ATC/OP 13, Modification 6, Condition III-E-17 (03/29/2004)]

6. The permittee shall not allow actual emissions from the soil vapor extraction and groundwater treatment system (EU: SR04) to exceed the calculated PTE listed in Table 3-4, irrespective of control efficiency, when the combustion unit is operated in any consecutive 12-month period. *[NSR ATC/OP 13, Modification 6, Condition III-A-26 (03/29/04)]*

**Table 3-4: PTE for Soil Vapor Extraction and Groundwater Treatment System (lb/hr)**

<b>EU</b>	<b>PM<sub>10</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>SO<sub>2</sub></b>	<b>VOC</b>	<b>HAP</b>
SR04	0.02	0.29	0.17	0.01	8.60	0.01

*Other*

7. The permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant exceeding an average of 20% opacity for a period of more than six consecutive minutes. *[AQR 26.1]*

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## 4.0 COMPLIANCE DEMONSTRATION REQUIREMENTS

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### 4.1 MONITORING

#### General

1. The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subparts A, Ka, Kb, and XX; 40 CFR Part 80; and 40 CFR Part 63, Subparts A, WW, and BBBB. [NSR ATC/OP 13, Modification 6, Condition III-E-1 (03/29/2004); AQR 12.5.2.6(d); and AQR 12.5.2.8(a)]
2. The permittee shall perform a monthly leak inspection using sight, sound, or smell of all equipment in gasoline service. [40 CFR Part 63.11089(a)]
3. The permittee shall, at the completion of each inspection, maintain and sign a log book containing a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility. [40 CFR 63.11089(b)]

#### Visible Emissions [AQR 12.5.2.6(d) & AQR 12.5.2.8]

4. The Responsible Official shall sign and adhere to the *Visible Emissions Check Guide* (1/11/2021) and keep a copy of the signed guide on-site at all times.
5. The permittee shall conduct a daily visual emissions check of the haul roads (EUs: E01).
6. The permittee shall conduct a quarterly visual emissions check of the air compressor (EUs: B11) while it is in operation.
7. The permittee shall conduct a quarterly visual emissions check of the fire water engine (EUs: D02) while it is in operation.
8. The permittee shall conduct daily visual emissions observations on the exhaust stack of the catalytic or thermal oxidation control device, whichever is being used, while it is in operation (EU: SR04).
9. If no plume appears to exceed the opacity standard during the visible emissions check, the date, location, and results shall be recorded, along with the viewer's name.
10. If a plume appears to exceed the opacity standard, the permittee shall do one of the following:
  - a. Immediately correct the perceived exceedance, then record the first and last name of the person who performed the emissions check, the date the check was performed, the unit(s) observed, and the results of the observation; or
  - b. Call a certified Visible Emissions Evaluation (VEE) reader to perform a U.S. Environmental Protection Agency (EPA) Method 9 evaluation.

- i. For sources required to have a certified reader on-site, the reader shall start Method 9 observations within 15 minutes of the initial observation. For all other sources, the reader shall start Method 9 observations within 30 minutes of the initial observation.
  - ii. If no opacity exceedance is observed, the certified VEE reader shall record the first and last name of the person who performed the VEE, the date the VEE was performed, the unit(s) evaluated, and the results. A Method 9 VEE form shall be completed for each emission unit that was initially perceived to have exceeded the opacity limit, and the record shall also indicate:
    - (1) The cause of the perceived exceedance;
    - (2) The color of the emissions; and
    - (3) Whether the emissions were light or heavy.
  - iii. If an opacity exceedance is observed, the certified VEE reader shall take immediate action to correct the exceedance. The reader shall then record the first and last name of the person performing the VEE, the date the VEE was performed, the unit(s) evaluated, and the results. A Method 9 VEE form shall be completed for each reading identified, and the record shall also indicate:
    - (1) The cause of the exceedance;
    - (2) The color of the emissions;
    - (3) Whether the emissions were light or heavy;
    - (4) The duration of the emissions; and
    - (5) The corrective actions taken to resolve the exceedance.
11. Any scenario of visible emissions noncompliance can and may lead to enforcement action.

Storage Tanks [AQR 12.5.2.6(d)/AQR 12.5.2.8(a)]

12. The permittee shall visually inspect annually, storage tanks equipped with an internal roof, the floating roof deck, deck fittings, and rim seal through openings in the fixed roof (EUs: A01-A13, A16, A17, A21, A28, A29, A45–A48, A58–A61, B04, and B05). [40 CFR Part 63.1063(c)(1) & (d)(2), 40 CFR Part 63.11092(e), and 40 CFR 60.110b(e)(5) ]
13. The permittee shall visually inspect from the top side floating roof deck of vessels equipped with an internal or external roof, the floating roof deck, deck fittings, and rim seal when the vessel is emptied and degassed or every 10 years whichever occurs first. (EUs: A01-A13, A16, A17, A21, A28, A29, A45–A48, A58–A61, B04, and B05). [40 CFR Part 63.1063(c)(1) & (d)(1) & (2), 40 CFR Part 63.11092(e), , and 40 CFR 60.110b(e)(5) ]

14. The permittee shall inspect the primary and secondary rim seals of external floating roofs for the presence and size of gaps between the rim seals and the wall of the storage vessel within 90 days of the initial filling. The secondary seal shall be inspected annually, and the primary seal shall be inspected every 5 years. (EUs: A01–A10). *[40 CFR 63.1063(c)(2) & (d)(3), 40 CFR Part 63.11092(e), and 40 CFR 60.110b(e)(5)]*
15. The permittee shall repair the items before refilling the storage vessel or empty and remove the storage vessel from service within 45 days. The permittee may use up to two extensions of 30 days each with the proper documentation (EUs: A01-A13, A16, A17, A21, A28, A29, A45–A48, A58–A61, B04, and B05). *[40 CFR 63.1063(e), 40 CFR Part 63.11092(e), and 40 CFR 60.110b(e)(5)]*
16. The permittee is exempt from monitoring the operations of each affected facility that stores petroleum liquids with an RVP of less than 6.9 kilopascals (1.0 pounds per square inch absolute [psia]) provided that the maximum true vapor pressure does not exceed that limit. *[40 CFR Part 60.113(d)(1); AQR 12.5.2.6(d)/AQR 12.5.2.8(a)]*
17. The permittee shall monitor the volume of throughput to each tank, including sumps and additives, in either gallons or barrels, and calculate monthly the combined throughput in any consecutive 12-month period (EUs: A01–A39, A45–A49, A53, A54, A56–A61, B04, B05, D01, H03, H04, H06–H12, H14–H18).
18. The permittee shall monitor the RVP of fuel products by sampling them monthly at their respective tanks, and calculate monthly the RVP of all combined fuel products stored in bulk storage tanks in any consecutive 12-month period. The consecutive 12-month period RVP limit will not apply to a storage tank that is not in service for 12 consecutive months (EUs: A01-A13, A16-A18, A21, A24, A27-A29, A45-A48, A58-A61, B04, B05).

#### Oil/Water Separator and Oil Storage Tank

19. The permittee shall monitor weekly VOC concentrations at the inlet and outlet of the carbon adsorber system (EUs: H11 and H12) to determine its control efficiency. *[NSR ATC 13, Modification 21, Condition IV-C-2 (08/30/2010); AQR 12.5.2.6(d); and AQR 12.5.2.8(a)]*
20. The permittee shall utilize a photoionization detector (PID) for weekly VOC monitoring. The control efficiency of the carbon absorber shall be calculated as 1 minus the VOC outlet concentration measured by the PID divided by the VOC inlet concentration measured by the PID/FID (EUs: H11 and H12). *[NSR ATC 13, Modification 21, Condition IV-C-3 (08/30/2010)]*
21. The permittee shall maintain and calibrate the PID unit according to its O&M manual. *[NSR ATC 13, Modification 21, Condition IV-C-4 (08/30/2010)]*

#### Loading Racks

22. The permittee shall monitor the volume of throughput of all products to the loading racks in either gallons or barrels (EU: B01) and calculate monthly the annual throughput as a 12-month rolling total. *[AQR 12.5.2.6(d) and AQR 12.5.2.8(a)]*

23. The permittee shall monitor the volume of gasoline throughput to the loading racks in either gallons or barrels (EU: B01) and calculate monthly the combined annual gasoline throughput in any consecutive 12-month period. *[AQR 12.5.2.6(d) and AQR 12.5.2.8(a)]*
24. The permittee shall, at least once per day, inspect all loading lanes and review all normal operations. The loading lane inspections shall include, but not be limited to, inspecting all check valves, flanges, hoses, and loading arms. Review of all normal operations shall include a walk-through. Detection methods incorporating sight, sound, or smell are acceptable. Detection of a leak shall be recorded, and the source of the leak repaired within five calendar days after it is detected. *[NSR ATC/OP 13, Modification 6, Condition III-E-4 (03/29/2004)]*
25. The permittee shall, for each calendar month, conduct inspections of the vapor collection system, the vapor processing system, and each loading rack handling gasoline during the loading of gasoline tank trucks for total organic compound, liquid, or vapor leaks. Detection methods incorporating sight, sound, and smell are acceptable. Each leak detection shall be recorded, and the source of the leak repaired within 15 calendar days after it is detected. *[40 CFR Part 60.502(j) and NSR ATC/OP 13, Modification 6, Condition III-B-11 (03/29/2004)]*
26. Delay of repair of any leaking equipment will be allowed upon a demonstration to the Control Officer that repairs within five days are not feasible. The permittee shall provide the reason(s) a delay is needed and the date by which each repair is expected to be completed. *[NSR ATC/OP 13, Modification 6, Conditions III-E-5, 6, and 7 (03/29/04)]*
27. The permittee shall limit the loading of liquid product into gasoline tank trucks to vapor-tight gasoline tank trucks using the following procedures: *[NSR ATC/OP 13, Modification 6, Condition III-E-11 (03/29/2004)]*
  - a. The permittee shall issue all tank truck drivers a driver identification card. No product can be loaded from any loading lane without a valid driver identification card and Personal Identification Number (PIN). Upon visiting the terminal for the first time, the driver shall present the operation staff with a valid driver's license, customer authorization letter, and current tank truck vapor tightness certification. All the information required under 40 CFR Part 60.505(b) will be entered into the permittee's data system, along with the expiration date for the truck vapor tightness certification. The expiration date can be no more than one year from the date of the issuance of the vapor tightness certificate.
  - b. The permittee shall scan all tank truck driver identification cards into the data system and enter the truck and trailer numbers before loading product at the terminal. If the vapor tightness certificate has expired, the driver will be instructed to see the operator on duty. The driver must present the operator with a new vapor tightness certificate, which will then be entered into the data system, in order to load the truck. The truck cannot load until the driver presents a new vapor tightness certificate.
  - c. The permittee shall monitor and record each reloading of a non-vapor-tight gasoline cargo tank at the facility before vapor tightness documentation for that cargo tank was obtained. *[40 CFR Part 63.11095(b)(2)]*

Loading Racks: Vapor Recovery Unit

28. The permittee shall operate and maintain a nondispersive infrared (NDIR) analyzer on the JZVRU (EU: B02) as a continuous emissions monitoring system (CEMS) to monitor VOC emissions from the exhaust of the on-line carbon bed. Emission readings shall be recorded and stored in a data acquisition system compatible with the analyzer. *[NSR ATC/OP 13, Modification 6, Condition III-A-4 (03/29/2004)]*
29. The permittee shall operate and maintain the CEMS in conformance with all provisions of 40 CFR Part 60.13 and 40 CFR Part 63.11092(b). *[NSR ATC/OP 13, Modification 6, Condition III-E-7 (03/29/2004)]*
30. The permittee shall demonstrate compliance with fuel dispensing operational and emission limitations specified in this permit by monitoring the following parameters of the JZVRU (EU: B02): *[NSR ATC/OP 13, Modification 6, Condition III-E-7 (03/29/2004)]*
  - a. Exhaust gas flow rate;
  - b. Hourly VOC concentration from the exhaust gas in lb/1,000 gal of petroleum loaded and mg/L of petroleum loaded;
  - c. Four-hour average VOC concentration from the exhaust gas in lb/1,000 gal of petroleum loaded and mg/L of petroleum loaded; and
  - d. Continuous product dispensing in gallons and liters.
31. Any exceedance of the four-hour average or annual VOC emission limitations, as determined by the CEMS, shall be considered a violation of the emission limit imposed and may result in enforcement action. *[NSR ATC/OP 13, Modification 6, Condition III-E-7 (03/29/2004)]*
32. The permittee shall obtain an approved quality assurance plan for all CEMS required by this section. The quality assurance plan (approved by DAQ on September 7, 2011) shall comply with 40 CFR Part 60, Appendix F – Quality Assurance Procedures and contain auditing schedules, reporting schedules, and design specifications for the CEMS system. *[NSR ATC/OP 13, Modification 6, Condition III-E-7 (03/29/2004)]*
33. The permittee is required to conduct a relative accuracy test audit (RATA) annually for all affected emission units to demonstrate compliance with CEM requirements. The permittee is subject to 40 CFR Part 60, Appendix F, and the *Clark County Department of Air Quality Guideline for Source Testing (9/19/2019)*. *[NSR ATC/OP 13, Modification 6, Condition III-F-7 (03/29/2004)]*
34. The permittee shall submit in writing all RATA protocols to the Control Officer for approval no less than 45 days before the proposed date for the audit.
35. The permittee shall submit the results of the RATA to the Control Officer within 60 days of the conclusion of the audit.
36. The permittee shall perform preventative daily, weekly, quarterly, and annual maintenance protocols on the JZVRU (EU: B02) in accordance with its O&M manual.



37. The permittee shall sample the glycol solution from the JZVRU separator (EU: B02) annually. The glycol sample shall be tested for pH and glycol content. The pH of the glycol solution must meet or be adjustable to O&M manual specifications; the glycol content must be in a concentration of 50% or greater. If either of these conditions cannot be met, the glycol solution must be replaced. *[NSR ATC/OP 13, Modification 6, Condition III-E-8 (03/29/2004)]*

#### Loading Racks: Auxiliary Flare

38. The permittee shall monitor the hours of operation of the flare unit (EU: B10) and calculate monthly its annual operating hours in any consecutive 12-month period. *[AQR 12.5.2.6(d)/AQR 12.5.2.8(a)]*
39. The permittee shall monitor flame instability with an optical scanner/sensor fitted on the flare unit (EU: B10) that will continuously verify the presence of a flame while in operation. If the scanner/sensor detects flame instability, the flare unit shall immediately shut down operations. *[NSR ATC/OP 13, Modification 6, Condition III-A-5 (03/29/2004)]*
40. The permittee will visually inspect flame quality during operation of the flare unit (EU: B10), once upon startup and once every two hours thereafter, documenting the date and time of each observation. *[NSR ATC/OP 13, Modification 6, Condition III-E-9 (03/29/2004)]*
41. If the flame is observed to be anything but clear blue, the permittee will increase visual inspections and perform any corrective actions dictated by the facility operating manual. *[NSR ATC/OP 13, Modification 6, Condition III-E-9 (03/29/2004)]*
42. The permittee shall test the saturator tank fluid on the flare unit (EU: B10) monthly and at the conclusion of any flare use in excess of 24 hours of cumulative operation. The test will consist of taking a representative sample from the saturator tank and analyzing it for American Petroleum Institute (API) gravity and vapor pressure. The fluid must be replaced if the analysis determines the API gravity to be less than 47 degrees or the RVP to be less than four psia. *[NSR ATC/OP 13, Modification 6, Condition III-E-10 (03/29/2004)]*
43. The permittee shall operate and maintain the flare unit (EU: B10) per the O&M manual. *[NSR ATC/OP 13, Modification 6, Condition III-E-3 (03/29/04)]*

#### Ethanol Unloading System

44. The permittee shall monitor the volume of ethanol throughput to the unloading system in gallons (EU: H09) and calculate monthly the annual throughput as a 12-month rolling total. *[AQR 12.5.2.6(d); AQR 12.5.2.8(a)]*

#### Haul Roads

45. Daily visual emissions check on the haul roads, including dates, observer names, locations, and results;
46. The permittee shall monitor daily the number of vehicle miles traveled on unpaved haul roads on-site by haul trucks entering and leaving.

47. The permittee shall monitor daily the number of vehicle miles traveled on paved haul roads on-site by haul trucks entering and leaving.
48. The permittee shall determine compliance with the opacity limits for unpaved haul roads when required by the Control Officer in accordance with one of the following, as applicable:
  - a. 40 CFR Part 60, Appendix A-4, “Test Methods 6 through 10B: Method 9—Visual Determination of the Opacity of Emissions from Stationary Sources”; or
  - b. The test method set forth in AQR 94.15.4, “Instantaneous Method.”

### Soil Vapor Extraction and Groundwater Treatment System

49. When operating a combustion unit for emission control of either the soil vapor extraction or groundwater treatment system, the permittee shall:
  - a. Operate and maintain a continuous flow monitor on the soil and groundwater treatment system (EU: SR04). *[NSR ATC/OP 13, Modification 6, Condition III-E-12 (03/29/2004); AQR 12.5.2.6(d); AQR 12.5.2.8(a)]*
  - b. Operate and maintain a continuous combustion chamber temperature monitor on the control device (EU: SR04). *[NSR ATC/OP 13, Modification 6, Condition III-A-19 (03/29/2004); AQR 12.5.2.6(d); AQR 12.5.2.8(a)]*
  - c. Cease operation of the combustion unit if the continuous combustion chamber temperature monitor malfunctions or shuts down (EU: SR04). *[NSR ATC/OP 13, Modification 6, Condition III-A-21 (03/29/2004); AQR 12.5.2.6(d); AQR 12.5.2.8(a)]*
  - d. Monitor the total flow rate (in standard cubic feet per meter) of the vapor stream to the combustion unit with each sample collected (EU: SR04). *[NSR ATC/OP 13, Modification 6, Condition III-E-16 (03/29/2004); AQR 12.5.2.6(d); AQR 12.5.2.8(a)]*
  - e. Monitor monthly the auxiliary fuel used by the combustion unit in standard cubic feet (EU: SR04). *[AQR 12.5.2.6(d); AQR 12.5.2.8(a)]*
  - f. Conduct a daily visual inspection of the combustion unit for smoke. If the unit exhibits black or white smoke at any time, it shall be shut down until the cause is determined and the unit repaired (EU: SR04). *[NSR ATC/OP 13, Modification 6, Condition III-E-17 (03/29/2004); AQR 12.5.2.6(d); AQR 12.5.2.8(a)]*
  - g. Demonstrate compliance with the remediation operational and emission limitations specified in this permit by monitoring the following parameters of the soil vapor extraction unit (EU: SR04): *[NSR ATC/OP 13, Modification 6, Condition III-E-12 (03/29/2004); AQR 12.5.2.6(d); AQR 12.5.2.8(a)]*
    - i. Hours of operation;
    - ii. Continuous exhaust gas flow rate;
    - iii. Continuous combustion chamber temperature; and

- iv. Hourly and quarterly accumulated mass emissions of VOC based on daily activities and monitoring data.
  - h. The permittee shall monitor weekly VOC concentrations at the inlet and outlet of the control device to determine emission rates and their control efficiency. *[NSR ATC/OP 13, Modification 6, Conditions III-A-25 & III-E-13 (03/29/2004); AQR 12.5.2.6(d); AQR 12.5.2.8(a)]*
  - i. The permittee shall use a PID for weekly VOC monitoring. *[NSR ATC/OP 13, Modification 6, Condition III-E-13 (03/29/2004); AQR 12.5.2.6(d); AQR 12.5.2.8(a)]*
  - j. The permittee shall calibrate and maintain the PID unit according to the O&M manual. *[NSR ATC/OP 13, Modification 6, Condition III-E-15 (03/29/2004); AQR 12.5.2.6(d); AQR 12.5.2.8(a)]*
  - k. The permittee shall collect air samples every two months to determine the concentration of VOC sent to the control devices and VOC emissions to the atmosphere. At a minimum, the samples shall be analyzed for total petroleum hydrocarbons (TPH) using EPA Test Method TO-3 (as modified for air use); for benzene, toluene, ethylbenzene, meta-, para-, and ortho-xylene, and methyl tert-butyl ether (MTBE) using Test Method TO-15 (as modified for air use); and for water vapor content. *[NSR ATC/OP 13, Modification 6, Condition III-E-14 (03/29/2004); AQR 12.5.2.6(d); AQR 12.5.2.8(a)]*
50. When operating a vapor-phase granular activated carbon adsorber unit for emission control of either the soil vapor extraction or the groundwater treatment system, the permittee shall: *[OP renewal application (04/28/2016)]*
- a. Monitor weekly VOC concentrations at the inlet and outlet of the carbon adsorber system to determine its control efficiency.
  - b. Use a PID for weekly VOC monitoring. The control efficiency of the carbon absorber shall be calculated as 1 minus the VOC outlet concentration measured by the PID divided by the VOC inlet concentration measured by the PID/FID (EUs: H11 and H12).
  - c. Maintain and calibrate the PID unit according to the O&M manual.
  - d. Collect air samples every two months to determine the concentration of VOC sent to the control devices and the emissions to the atmosphere. At a minimum, the samples shall be analyzed for TPH using Test Method TO-3 (as modified for air use); for benzene, toluene, ethylbenzene, meta-, para-, and ortho-xylene, and MTBE using Test Method TO-15 (as modified for air use); and for water vapor content.

*Engines/Air Compressor/Fire Water Engine*

- 51. The permittee shall operate each diesel engine (EUs: B11 and D02) with a nonresettable hour meter. *[AQR 12.5.2.6(d); AQR 12.5.2.8(a)]*
- 52. The permittee shall monitor the hours of operation of the diesel-powered fire water engine (EU: D02) and calculate monthly the annual hours of operation for testing and maintenance, plus a separate calculation for emergencies. *[AQR 12.5.2.6(d); AQR 12.5.2.8(a)]*

53. The permittee shall operate the diesel-powered air compressor (EU: B11) with a nonresettable hour meter, monitor the duration of operation and calculate monthly the annual hours of operation. [AQR 12.5.2.6(d); AQR 12.5.2.8(a)]

### Cooling Tower

54. The permittee shall monitor the TDS content of the cooling tower circulation water monthly using a conductivity meter (EU: H05). [AQR 12.5.2.6(d); AQR 12.5.2.8(a)]

## **4.2 TESTING**

### General

1. The permittee shall comply with all applicable testing requirements in 40 CFR Part 60, Subparts A, Ka, Kb, and XX; 40 CFR Part 80; and 40 CFR Part 63, Subparts A, WW, and BBBB. [AQR 12.5.2.8(a)]
2. Performance testing is subject to 40 CFR Part 60.8, Subpart A, Appendix A (as amended) and the *Clark County Department of Air Quality Guideline for Source Testing (9/19/2019)*. Performance testing shall be the instrument for determining initial and subsequent compliance with the emission limitations set forth in this Part 70 OP and all related and/or relevant 40 CFR Part 60 and 63 subparts. [MSP, September 10, 2013, Condition IV-B-10 and AQR 12.5.2.8(a)]
3. The permittee shall submit to the Control Officer for approval a performance testing protocol that contains testing, reporting, and notification schedules, test protocols, and anticipated test dates no less than 45 days, but no more than 90 days, before the anticipated date of the performance test unless otherwise specified in this permit. [AQR 12.5.2.8]
4. The permittee shall submit to EPA for approval any alternative test methods not already approved to demonstrate compliance with a requirement under 40 CFR Part 60. [40 CFR Part 60.8(b)]
5. The Control Officer will consider approving the permittee's request for alternative performance test methods if it is proposed in writing in the performance test protocols. [AQR 12.5.2.8(a)]
6. At the Control Officer's request, the permittee shall provide necessary holes in stacks or ducts and such other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices, as may be necessary for proper determination of the emission of air contaminants. [AQR 4.2]
7. At the Control Officer's request, the permittee shall test (or have tests performed) to determine emissions of air contaminants from any source whenever the Control Officer has reason to believe that an emission in excess of those allowed by the AQRs is occurring. The Control Officer may specify testing methods to be used in accordance with good professional practice, and may observe the testing. All tests shall be conducted by reputable, qualified personnel. [AQR 4.2]

8. The permittee shall submit a report describing the results of each performance test to the Control Officer within 60 days of the end of the performance tests. *[MSP: September 10, 2013, Condition IV-B-10 and AQR 12.5.2.8(a)]*
9. The permittee of any stationary source that fails to demonstrate compliance with emissions standards or limitations during any performance test shall submit a compliance plan to the Control Officer within 90 days of the end of the performance test. *[AQR 10.1 and AQR 12.5.2.8(a)]*
10. The Control Officer may require additional performance testing when operating conditions appear inadequate to demonstrate compliance with the emissions and/or limitations in this permit. *[AQR 4.2 and AQR 12.5.2.8(a)]*

*Loading Racks: Vapor Recovery Unit*

11. The permittee shall conduct subsequent performance tests on the JZVRU (EU: B02) at five-year intervals on dates that do not exceed 90 days past the anniversary date of the previous performance test. *[AQR 12.5.2.6]*
12. The permittee shall, immediately before the performance test on the JZVRU (EU: B02), use EPA Test Method 21 to monitor for vapor leakage at all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The owner or operator shall repair all leaks with readings of 500 ppm (as methane) or greater before conducting the performance test. *[AQR 12.5.2.6 and 40 CFR Part 63.11092(a)(1)(i)]*
13. The performance test shall be six hours long, during which at least 300,000 liters of gasoline shall be loaded. If 300,000 liters cannot be loaded in six hours, the test may either be continued until 300,000 liters of gasoline are loaded or resumed the next day with another complete six-hour period. If the test is resumed, the 300,000-liter criterion need not be met; however, as much as possible, testing should be conducted during the six-hour period in which the highest throughput normally occurs. *[40 CFR Part 60.503(b), 40 CFR Part 60.503(b)(1), and NSR ATC/OP 13, Modification 6, Condition III-F-6 (03/29/2004)]*
14. The permittee shall employ performance testing methodologies for the JZVRU (EU: B02) as indicated in Table 4-1.

**Table 4-1: Performance Testing Methods for John Zink VRU (EU: B02)**

Test Criteria	EPA Test Method
Determination of VOC leaks (pre-test)	21
Stack parameters	1-4
Combustion vapor processing system	2B
All other vapor processing systems	2A
Determination of total organic compound concentrations	25A, 25B, or 18

*Soil Vapor Extraction and Groundwater Treatment System*

15. The permittee shall, when beginning to operate a combustion unit for either the soil vapor extraction or groundwater treatment system, conduct an initial performance test to demonstrate compliance with the control efficiencies and emission rates established in the OP. *[AQR 12.5.2.6]*

16. The permittee shall conduct subsequent performance tests on the combustion unit at five-year intervals on dates that do not exceed 90 days past the anniversary date of the previous performance test. [AQR 12.5.2.6]
17. The permittee shall employ performance testing methodologies for the soil vapor extraction and groundwater treatment systems as indicated in Table 4-2. [AQR 12.5.2.6]

**Table 4-2: Performance Testing Methods**

Test Criteria	EPA Test Method
Stack parameters	1-4
Determination of total organic compound concentrations	25A

### 4.3 RECORDKEEPING

1. The permittee shall keep records of all inspections, maintenance, and repairs as required by this OP. [AQR 12.5.2.6(d) and AQR 12.5.2.8]
2. The permittee shall comply with all applicable recordkeeping requirements of 40 CFR Part 60.7; 40 CFR Part 60, Subparts Ka, Kb and XX; and 40 CFR Part 63, Subparts A, BBBB, and ZZZZ. [AQR 12.5.2.6]
3. All records, logs, etc., or copies thereof, shall be kept on-site for a minimum of five years from the date the measurement or data was entered. [AQR 12.5.2.6(d) and AQR 12.5.2.8]
4. Records and data required by this permit to be maintained by the permittee may be audited at any time by a third party selected by the Control Officer. [AQR 4.1]
5. At a minimum, the permittee shall create and maintain the records identified in Section 4.3.1, all of which must be producible on-site to the Control Officer’s authorized representative upon request and without prior notice during the permittee’s hours of operation. [AQR 12.5.2.6(d) and AQR 12.5.2.8]
6. The permittee shall maintain the following records for reporting: [AQR 12.5.2.6(d) and AQR 12.5.2.8]

#### General

- a. Calendar year annual emissions for the entire source (annual report only);

#### Storage Tanks

- b. Monthly total throughput of individual tanks and sumps (EUs: A01–A61, B04, B05, D01, H02–H04, H06–H08, and H10–H18);
- c. Monthly, consecutive 12-month total throughput of all tanks combined, including additives (EUs: A01–A61, B04, B05, D01, H02–H04, H06–H08, and H10–H18);
- d. Monthly, consecutive 12-month average RVP of all combined fuel products;

- e. For storage vessels complying with 40 CFR Part 63.11087(b), the storage vessel's Notice of Compliance Status information can be included in the next semiannual compliance report in lieu of filing a separate Notification of Compliance Status report under Part 63.11093; [40 CFR Part 63.11095(c)(iv)]

Oil / Water Separator and Oil Storage Tank

- f. Weekly monitoring results and calculated efficiency of the carbon adsorber on the OSW (EUs: H11 and H12);

Loading/Offloading Racks

- g. Monthly, consecutive 12-month total throughput of all products through the loading racks;
- h. Monthly, consecutive 12-month total throughput of gasoline through the loading racks;
- i. Monthly, consecutive 12-month total throughput of B-100 fuel through the offloading racks;

Loading Racks: Auxiliary Flare

- j. Monthly, consecutive 12-month total hours of operation of the auxiliary flare (EU: B10);

Ethanol Unloading System

- k. Monthly, consecutive 12-month total throughput of ethanol through the unloading system;

Haul Roads (EU: E01)

- l. Monthly, consecutive 12-month total number of trips of the haul trucks and calculated VMT separately for paved and unpaved roads;

Soil Vapor Extraction and Groundwater Treatment System (EU: SR04)

- m. Weekly PID monitoring results on the inlet and exhaust vapor streams;
- n. Quarterly accumulated mass emissions of VOC;

Diesel Engines

- o. Monthly, consecutive 12-month total hours of operation of diesel-powered air compressor (EU: B11);
- p. Monthly and annual hours of operation of the diesel-powered fire water engine for testing, maintenance, and nonemergency use (EU: D02);
- q. Monthly and annual hours of operation of the diesel-powered fire water engine for emergency use, including documentation justifying use during the emergency (EU: D02);

CEMS

- r. CEMS audit results or accuracy checks, corrective actions, etc., as required by 40 CFR Part 60, Appendix F; 40 CFR Part 63; and the CEMS quality assurance (QA) plan;
- s. All CEMS information required by the CEMS monitoring plan, as specified in Section 4.1 of this permit;
- t. Time, duration, nature, and probable cause of any CEMS downtime, and any corrective actions taken;
- u. Each exceedance or failure to maintain, as appropriate, the monitored operating parameter values; monitoring data for the days on which exceedances or failures to maintain occurred; and a description and the timing of the steps taken to repair or perform maintenance on the vapor collection and processing systems or the CEMS; *[40 CFR Part 63.11095(b)(3)]*
- v. Each instance in which malfunctions discovered during the required monitoring and inspections for the CEMS were not resolved according to the necessary corrective actions described in the monitoring and inspection plan. This report shall include a description of the malfunction and the timing of the steps taken to correct it. *[40 CFR Part 63.11095(b)(4)]*

Other

- w. Each instance of a non-vapor-tight gasoline cargo tank loading at the facility in which the permittee failed to assure that the cargo tank would not reload before obtaining vapor tightness documentation for that cargo tank; *[40 CFR Part 63.11095(b)(1)]*
- x. Each reloading of a non-vapor-tight gasoline cargo tank at the facility before obtaining vapor tightness documentation for that cargo tank in accordance with 40 CFR Part 63.1109(b); *[40 CFR Part 63.11095(b)(2)]*
- y. The number, duration, and a brief description of each type of malfunction that occurred during the reporting period and that caused, or may have caused, any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with 40 CFR Part 63.11085(a), including actions taken to correct a malfunction. The report may be submitted as part of the semiannual compliance report, if one is required; *[40 CFR Part 63.11095(d)]*
- z. Vapor recovery system testing results, if applicable (reported as required by Section 4-2);
- aa. Deviations from permit requirements resulting in excess emissions (report as required by Section 4-4); and
- bb. Deviations from permit requirements not resulting in excess emissions;
- cc. If no excess emission events have occurred during the previous 6-month period, no report is required. *[40 CFR Part 63.11095(c)]*



7. The permittee shall maintain records of the following on-site: *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*

Storage Tanks

- a. Monthly RVP sampled for all fuel products in their respective tanks;
- b. Records of all fuel types serviced by each tank, with corresponding service dates and gasoline vapor pressures (EUs: A01–A24, A27–A29, A45–A48, A56–A61, B04, B05, and D01);
- c. Records of visual inspections on the storage tanks as required by Section 4.1 of this permit. These shall be kept on-site for a minimum for two years and include the following: *[40 CFR Part 60.115b and 40 CFR Part 63.11081(j)]*
  - i. The storage vessel on which the inspection was performed;
  - ii. The date the vessel was inspected; and
  - iii. The observed condition of each component of the control equipment (seals, floating roof, and fittings).
- d. Records of measurements of seal gaps on applicable storage tanks as required by Section 4.1 of this permit (EUs: A01–A10), as follows:
  - i. Date of measurement;
  - ii. Raw data obtained in the measurement; and
  - iii. The calculations described in 40 CFR Part 60.113b(b).
- e. The information specified in 40 CFR Parts 60.115b(a), 60.115b(b), or 60.115b(c) (Subpart Kb) if complying with 2(a), 2(b), or 2(c) in Table 1 of 40 CFR Part 63, Subpart BBBBBB, depending upon the control equipment installed; the information specified in 40 CFR Part 63.1066 if complying with option 2(d) in Table 1; *[40 CFR Part 63.11095(a)(1)]*
- f. The number of equipment leaks not repaired within 15 days after detection; *[40 CFR Part 63.11095(a)(3)]*
- g. Each equipment leak where no repair attempt was made within 5 days or for which a repair was not completed within 15 days after detection and excess emission resulted, including the following: *[40 CFR Part 63.11095(b)(5)]*
  - i. The date the leak was detected;
  - ii. The date of each attempt to repair the leak;
  - iii. The reasons for delaying the repair; and
  - iv. The date of successful repair.

### Loading/Offloading Racks

- h. For loading racks, documentation of each loading of a gasoline cargo tank for which vapor tightness documentations had not been previously obtained by the facility; [40 CFR Part 63.11095(a)(2)]
- i. Daily inspections of loading lanes;
- j. Monthly inspections of loading racks, along with vapor collection and processing systems;
- k. Maintenance and repairs associated with daily and monthly inspections of loading racks and loading lanes;
- l. Tanker trucks entered into the data system for vapor tightness certification;

### Loading Racks: Vapor Recovery Unit

- m. Exhaust gas flow rate from the VRU (EU: B02);
- n. Hourly VOC concentrations from the VRU exhaust gas (EU: B02);
- o. Four-hour average VOC concentrations from the VRU exhaust gas (EU: B02);
- p. Five-year vapor leakage monitoring results on the VRU (EU: B02), including corrective actions;
- q. Five-year performance testing results on the VRU (EU: B02), including corrective actions;
- r. Annual RATA audit results, including corrective actions;
- s. Daily, weekly, quarterly, and annual maintenance of the VRU, including dates and corrective actions;
- t. Annual glycol solution sampling results;

### Loading Racks: Auxiliary Flare

- u. Dates and times of operation of the auxiliary flare (EU: B10);
- v. Visual inspections of the flame quality on the auxiliary flare (EU: B10) during operation, including dates, times, and corrective actions;
- w. Maintenance and repairs on the auxiliary flare (EU: B10);
- x. Saturator tank fluid testing results and corrective actions (EU: B10);

### Haul Roads (EU: E01)

- y. Daily the number of vehicle miles traveled on unpaved haul roads on-site by haul trucks entering and leaving;

- z. Daily the number of vehicle miles traveled on paved haul roads on-site by haul trucks entering and leaving;
- aa. Log of dust control measures applied to unpaved roads accessing or located on the site and in vacant areas;

Soil Vapor Extraction and Groundwater Treatment System (EU: SR04)

- bb. Continuous hours of operation;
- cc. Continuous flow rate of the exhaust gas;
- dd. If a combustion unit is used for control, a continuous combustion chamber temperature in the combustion unit;
- ee. Dates of the mode of operation;
- ff. Calibration of the PID;
- gg. Maintenance and repair of the PID;
- hh. Bimonthly sampling results on inlet and exhaust vapor streams, including total flow rate;
- ii. If a combustion unit is used for control, daily visible emissions observations from the combustion unit;
- jj. Maintenance and repair of the soil vapor extraction and groundwater treatment system and of the combustion unit, when operated;
- kk. If a combustion unit is used for control, monthly volume of auxiliary fuel used by the combustion unit (in square cubic feet);
- ll. Hourly accumulated mass emissions of VOC;

Diesel Engines (EUs: A03 and A07)

- mm. Visual emissions check when operating the diesel fire water engine (EU: D02) and air compressor engine (EU: B11), including dates, observer names, locations, and results;
- nn. Records of air compressor (EU: B11) and fire water engine (EU: D02) inspection/maintenance;

Cooling Towers

- oo. Monthly TDS content of cooling tower circulation water (EU: H05);

Other

- pp. Location changes of nonroad engines, if applicable;

- qq. Quality assurance plan that contains auditing schedules, reporting schedules, and design specifications for the CEMS. The CEMS shall conform to applicable provisions of 40 CFR Part 60, Subpart GG and 40 CFR Part 75 (the plan must have been approved by the Control Officer);
- rr. Log of visible emissions checks on all emission units, including the air compressor and the fire water engine;
- ss. Log of thermocouple calibrations, maintenance, and operation;
- tt. Magnitude and duration of excess emissions, notifications, monitoring system performance, malfunctions, corrective actions taken, etc. as required by 40 CFR Part 60.7; and
- uu. Summary of results of all performance testing.

#### **4.4 REPORTING AND NOTIFICATIONS**

1. The permittee shall certify compliance with the terms and conditions contained in this Part 70 OP, including emission limitations, standards, work practices, and the means for monitoring such compliance. *[AQR 12.5.2.8(e)]*
2. The permittee shall submit compliance certifications annually in writing to the Control Officer (4701 W. Russell Road, Suite 200, Las Vegas, NV 89118) and the Region 9 Administrator (Director, Air and Radiation Division, 75 Hawthorne St., San Francisco, CA 94105). A compliance certification for each calendar year will be due on January 30 of the following year and shall include the following: *[AQR 12.5.2.8(e)]*
  - a. The identification of each term or condition of the permit that is the basis for the certification;
  - b. The identification of the methods or other means used by the permittee for determining the status of compliance with each term and condition during the certification period. These methods and means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements described in 40 CFR Part 70.6(a)(3). If necessary, the permittee shall also identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the Clean Air Act, which prohibits knowingly making a false certification or omitting material information; and
  - c. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the methods or means designated in 2.b above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify, as possible exceptions to compliance, any periods during which compliance was required and in which an excursion or exceedance, as defined under 40 CFR Part 64, occurred.
  - d. The permittee shall submit:

- i. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the dates provided in Subpart 68.10(a) through (f) and 68.96(a) and (b)(2)(i), or
  - ii. As part of the compliance certification under 40 CFR 70.6(c)(5), a certification statement that the source is in compliance with all requirements of this part, including the registration and submission of the risk management plan.
3. The permittee shall report to the Control Officer any startup, shutdown, malfunction, emergency, or deviation that causes emissions of regulated air pollutants in excess of any limits set by regulations or this permit. The report shall be in two parts, as specified below: *[AQR 12.5.2.6(d)(4)(B); AQR 25.6.1]*
  - a. Within 24 hours of the time the permittee learns of the excess emissions, the permittee shall notify DAQ by phone at (702) 455-5942, by fax at (702) 383-9994, or by email at [airquality@clarkcountynv.gov](mailto:airquality@clarkcountynv.gov).
  - b. Within 72 hours of the notification required by 3.a above, the permittee shall submit a detailed written report to DAQ containing the information required by AQR 25.6.3.
4. With the semiannual monitoring report, the permittee shall report to the Control Officer all deviations from permit conditions that do not result in excess emissions, including those attributable to malfunction, startup, or shutdown. Reports shall identify the probable cause of each deviation and any corrective actions or preventative measures taken. *[AQR 12.5.2.6(d)(4)(B)]*
5. The owner or operator of any source required to obtain a permit under AQR 12 shall report to the Control Officer emissions in excess of an applicable requirement or emission limit that pose a potential imminent and substantial danger to public health and safety or the environment as soon as possible, but no later than 12 hours after the deviation is discovered, and submit a written report within two days of the occurrence. *[AQR 25.6.2]*
6. The permittee shall submit all compliance certifications to EPA and the Control Officer. *[AQR 12.5.2.8(e)(4)]*
7. Any application form, report, or compliance certification submitted to the Control Officer pursuant to the permit or the AQRs shall contain a certification by a Responsible Official, with an original signature, of truth, accuracy, and completeness. This certification, and any other required under AQR 12.5, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *[AQR 12.5.2.6(l)]*
8. The permittee shall furnish to the Control Officer, in writing and within a reasonable time, any information that the Control Officer may request to determine whether cause exists for revising, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Control Officer copies of records that the permit requires keeping. The permittee may furnish records deemed confidential directly to the Administrator, along with a claim of confidentiality. *[AQR 12.5.2.6(g)(5)]*

9. At the Control Officer's request, the permittee shall provide any information or analyses that will disclose the nature, extent, quantity, or degree of air contaminants that are or may be discharged by the source, and the type or nature of control equipment in use. The Control Officer may require such disclosures be certified by a professional engineer registered in the state. In addition to this report, the Control Officer may designate an authorized agent to make an independent study and report on the nature, extent, quantity, or degree of any air contaminants that are or may be discharged from the source. An agent so designated may examine any article, machine, equipment, or other contrivance necessary to make the inspection and report. *[AQR 4.1]*
10. The permittee shall submit annual emissions inventory reports based on the following: *[AQR 18.6.1 and AQR 12.5.2.4]*
  - a. The annual emissions inventory must be submitted to DAQ by March 31 of each calendar year (if March 31 falls on a Nevada or federal holiday, or on any day the office is not normally open for business, the submittal shall be due on the next regularly scheduled business day);
  - b. The calculated actual annual emissions from each emission unit shall be reported even if there was no activity, along with the total calculated actual annual emissions for the source based on the emissions calculation methodology used to establish the PTE in the permit or an equivalent method approved by the Control Officer prior to submittal; and
  - c. As the first page of text, a signed certification containing the sentence: "I certify that, based on information and belief formed after reasonable inquiry, the statements contained in this document are true, accurate, and complete." This statement shall be signed and dated by a Responsible Official of the company (a sample form is available from DAQ).
11. Stationary sources that emit 25 tons or more of nitrogen oxide (NO<sub>x</sub>) and/or 25 tons or more of VOC from their emission units, insignificant activities, and exempt activities during a calendar year shall submit an annual emissions statement for both pollutants. Emissions statements must include actual annual NO<sub>x</sub> and VOC emissions from all activities, including emission units, insignificant activities, and exempt activities. Emissions statements are separate from, and additional to, the calculated annual emissions reported each year for all regulated air pollutants (i.e., the emissions inventory). *[AQR 12.9.1]*
12. The permittee shall comply with all applicable notification and reporting requirements of 40 CFR Part 60, Subparts A, K, Kb, and XX; 40 CFR Part 80; and 40 CFR Part 63, Subparts A, WW, and BBBB. *[AQR 12.5.2.6(d)]*
13. The permittee shall submit semiannual monitoring reports to DAQ. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*
14. The following requirements apply to semiannual reports: *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*
  - a. The report shall include all items listed in Section 4.3.6.

- b. The report shall be based on a calendar semiannual period, which includes partial reporting periods.
- c. The report shall be received by DAQ within 30 calendar days after the semiannual period.

15. Regardless of the date of issuance of this OP, the source shall comply with the schedule for report submissions outlined in Table 4-3. [AQR 12.5.2.6(d) and AQR 12.5.2.8]

**Table 4-3: Required Submission Dates for Various Reports**

Required Report	Applicable Period	Due Date
Semiannual report for 1 <sup>st</sup> six-month period	January, February, March, April, May, June	July 30 each year <sup>1</sup>
Semiannual report for 2 <sup>nd</sup> six-month period; any additional annual records required	July, August, September, October, November, December	January 30 each year <sup>1</sup>
Annual Compliance Certification	Calendar year	January 30 each year <sup>1</sup>
Annual Emissions Inventory Report	Calendar year	March 31 each year <sup>1</sup>
Annual Emissions Statement <sup>2</sup>	Calendar year	March 31 each year <sup>1</sup>
Notification of Malfunctions, Startup, Shutdowns, or Deviations with Excess Emission	As required	Within 24 hours of the permittee learns of the event
Excess Emissions that Pose a Potential Imminent and Substantial Danger	As required	No less than 45 days, but no more than 90 days, before the anticipated test date <sup>1</sup>
Report of Malfunctions, Startup, Shutdowns, or Deviations with Excess Emission	As required	Within 72 hours of the notification <sup>1</sup>
Deviation Report without Excess Emissions	As required	Along with semiannual reports <sup>1</sup>
Performance Testing Protocol	As required	No less than 45 days, but no more than 90 days, before the anticipated test date <sup>1</sup>
Performance Testing Results	As required	Within 60 days of end of test <sup>1</sup>
RATA Protocol	As required	No less than 45 days, but no more than 90 days, before the anticipated test date <sup>1</sup>
RATA Results	As required	Within 60 days of end of test <sup>1</sup>

<sup>1</sup> If the due date falls on a state or federal holiday, or on any day the office is not normally open for business, the submittal is due on the next business day.

<sup>2</sup> Required only for stationary sources that emit 25 tons or more of NO<sub>x</sub> and/or 25 tons or more of VOC during a calendar year.

16. The Control Officer reserves the right to require additional reporting to verify compliance with permit emission limits, applicable permit requirements, and requirements of applicable federal regulations. [AQR 4.1]

## 4.5 MITIGATION

### Offsets

The source has no federal offset requirements. [AQR 12.7]



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## 5.0 PERMIT SHIELD

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### Permit Shield

1. The source has not requested a permit shield. [AQR 12.5.2.9]

### Streamlining (Requirements Specifically Identified as Applicable)

2. The source has not requested a permit shield for any of the applicable requirements. However, the following requirements have been streamlined for the VRU (EU: B02); the most stringent requirements have been included in the permit.
3. The applicable requirements have been streamlined for DAQ convenience. [AQR 12.5.2.9]

**Table 5-1: Applicable Requirements Streamlined**

EU	Reg. (40 CFR Part)	Reg. Std.	Permit Limit	Value Comparison (in Units of Permit Limit)			
				Std. Value	Permit Limit Value	Permit Limit as or More Stringent?	Permit Limit as or More Stringent?
B02	63.11092(a)(2)	80 mg/L	2.4 mg/L	80 mg/L	2.4 mg/L	Yes	Yes
	60.502	35 mg/L	2.4 mg/L	35 mg/L	2.4 mg/L	Yes	Yes

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## 6.0 OTHER REQUIREMENTS

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1. Any person who violates any provision of the AQRs, including, but not limited to, any application requirement; any permit condition; any fee or filing requirement; any duty to allow or carry out inspection, entry, or monitoring activities; or any requirements from DAQ is guilty of a civil offense and shall pay a civil penalty levied by the Air Pollution Control Hearing Board and/or the Hearing Officer of not more than \$10,000. Each day of violation constitutes a separate offense. *[AQR 9.1; NRS 445B.640]*
2. Any person aggrieved by an order issued pursuant to AQR 9.1 is entitled to review, as provided in Chapter 233B of the NRS. *[AQR 9.12]*
3. The permittee shall comply with the requirements of 40 CFR Part 61, Subpart M—the National Emission Standard for Asbestos—for all demolition and renovation projects. *[AQR 13.1(b)(8)]*
4. The permittee shall not use, sell, or offer for sale any fluid as a substitute material for any motor vehicle, residential, commercial, or industrial air conditioning system, refrigerator freezer unit, or other cooling or heating device designated to use a chlorofluorocarbon or hydrochlorofluorocarbon compound as a working fluid unless such fluid has been approved for sale in such use by the Administrator. The permittee shall keep records of all paperwork relevant to the applicable requirements of 40 CFR Part 82 on-site. *[40 CFR Part 82]*
5. A risk management plan is required for the storing, handling and use of any applicable “Highly Hazardous Chemical” pursuant to 40 CFR Part 68. The permittee shall submit revisions of the risk management plan to the appropriate authority and a copy to DAQ. *[40 CFR Part 68.215 (a)(1)]*

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## 7.0 ADMINISTRATIVE REQUIREMENTS

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### 7.1 GENERAL

1. The permittee shall comply with all conditions of the Part 70 OP. Any permit noncompliance may constitute a violation of the Clark County Air Quality Regulations (AQRs), Nevada law, and the Clean Air Act, and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a renewal application. [AQR 12.5.2.6(g)(1)]
2. If any term or condition of this permit becomes invalid as a result of a challenge to a portion of this permit, the other terms and conditions of this permit shall be unaffected and remain valid. [AQR 12.5.2.6(f)]
3. The permittee shall pay all permit fees pursuant to AQR 18. [AQR 12.5.2.6(h)]
4. This permit does not convey property rights of any sort, or any exclusive privilege. [AQR 12.5.2.6(g)(4)]
5. The permittee agrees to allow inspection of the premises to which this permit relates by any authorized representative of the Control Officer at any time during the permittee's hours of operation without prior notice. The permittee shall not obstruct, hamper, or interfere with any such inspection. [AQR 4.1; AQR 5.1.1; and AQR 12.5.2.8(b)]
6. The permittee shall allow the Control Officer, upon presentation of credentials, to: [AQR 4.1 and AQR 12.5.2.8(b)]
  - a. Access and copy any records that must be kept under the conditions of the permit;
  - b. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
  - c. Sample or monitor substances or parameters for the purpose of assuring compliance with the permit or applicable requirements; and
  - d. Document alleged violations using such devices as cameras or video equipment.
7. Any permittee who fails to submit relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit the needed supplementary facts or corrected information. In addition, the permittee shall provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit. A Responsible Official shall certify the additional information consistent with the requirements of AQR 12.5.2.4. [AQR 12.5.2.2]
8. Anyone issued a permit under AQR 12.5 shall post it in a location where it is clearly visible and accessible to facility employees and DAQ representatives. [AQR 12.5.2.6(m)]

9. The permittee shall not use as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. *[AQR 12.5.2.6(g)(2)]*

## **7.2 MODIFICATION, REVISION, AND RENEWAL REQUIREMENTS**

1. No person shall begin actual construction of a new Part 70 source, or modify or reconstruct an existing Part 70 source that falls within the preconstruction review applicability criteria, without first obtaining an ATC Permit from the Control Officer. *[AQR 12.4.1.1(a)]*
2. This permit may be revised, revoked, reopened and reissued, or terminated for cause by the Control Officer. The filing of a request by the permittee for a permit revision, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance, does not stay any permit condition. *[AQR 12.5.2.6(g)(3)]*
3. The permit shall be reopened under any of the following circumstances and when all applicable requirements pursuant to AQR 12.5.2.15 are met: *[AQR 12.5.2.15(a)]*
  - a. New applicable requirements become applicable to a stationary source considered “major” (per the definition in AQR 12.2, AQR 12.3, or 40 CFR Part 70.3(a)(1)) with a remaining permit term of three or more years;
  - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under the Acid Rain Program;
  - c. The Control Officer or EPA determines that the permit contains a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
  - d. The Administrator or Control Officer determines that the permit must be revised or revoked to assure compliance with applicable requirements.
4. A permit, permit revision, or permit renewal may be approved only if all the following conditions have been met: *[AQR 12.5.2.10(a)]*
  - a. The permittee has submitted to the Control Officer a complete application for a permit, permit revision, or permit renewal, except that a complete application need not be received before a Part 70 general permit is issued pursuant to AQR 12.5.2.20; and
  - b. The conditions of the permit provide for compliance with all applicable requirements and the requirements of AQR 12.5.
5. The permittee shall not build, erect, install, or use any article, machine, equipment, or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission that would otherwise constitute a violation of an applicable requirement. *[AQR 80.1 and 40 CFR Part 60.12]*
6. No permit revisions shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit. *[AQR 12.5.2.6(i)]*

7. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. *[AQR 12.5.2.11(b)]*
8. For purposes of permit renewal, a timely application is a complete application that is submitted at least 6 months, but not more than 18 months, prior to the date of permit expiration. If a source submits a timely application under this provision, it may continue operating under its current Part 70 OP until final action is taken on its application for a renewed Part 70 OP. *[AQR 12.5.2.1(a)(2)]*

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## 8.0 ATTACHMENTS

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### 8.1 APPLICABLE REGULATIONS

#### *Requirements Specifically Identified as Applicable*

1. NRS, Chapter 445B.
2. Applicable AQRs listed in Table 8-1.

**Table 8-1: Applicable Clark County AQRs**

Citation	Title
AQR 00	"Definitions"
AQR 04	"Control Officer"
AQR 05	"Interference with Control Officer"
AQR 08	"Persons Liable for Penalties – Punishment: Defense"
AQR 09	"Civil Penalties"
AQR 10	"Compliance Schedules"
AQR 11	"Ambient Air Quality Standards"
AQR 12.0	"Applicability and General Requirements"
AQR 12.4	"Authority to Construct Application and Permit Requirements for Part 70 Sources"
AQR 12.5	"Part 70 Operating Permit Requirements"
AQR 12.9	"Annual Emissions Inventory Requirement"
AQR 13	"National Emission Standards for Hazardous Air Pollutants"
AQR 14.1(b)(1)	"Subpart A – General Provisions"
AQR 18	"Permit and Technical Service Fees"
AQR 25	"Affirmative Defense for Excess Emissions due to Malfunctions, Startup, and Shutdown"
AQR 26	"Emission of Visible Air Contaminants"
AQR 28	"Fuel Burning Equipment"
AQR 40	"Prohibitions of Nuisance Conditions"
AQR 41	"Fugitive Dust", AQR 41.1.2 only
AQR 42	"Open Burning"
AQR 43	"Odors in the Ambient Air"
AQR 50	"Storage of Petroleum Products"
AQR 51	"Petroleum Product Loading into Tank Trucks and Trailers"
AQR 70	"Emergency Procedures"
AQR 80	"Circumvention"

3. Clean Air Act Amendments (42 U.S.C. § 7401, et seq.)
4. Applicable 40 CFR sections are listed in Table 8-2.

**Table 8-2: Federal Standards**

<b>Citation</b>	<b>Title</b>
40 CFR Part 52.21	"Prevention of significant deterioration of air quality"
40 CFR Part 52.1470	"Approval and Promulgation of Implementation Plans, Subpart DD—Nevada"
40 CFR Part 60, Subpart A	"General Provisions"
40 CFR Part 60, Appendix A	Appendix A, Method 9 or equivalent (opacity)
40 CFR Part 60, Appendix A-3	"Test Methods 4 through 5I" (PM in grams/dry standard cubic meter)
40 CFR Part 60, Appendix A-4	"Test Methods 6 through 10B" (opacity)
40 CFR Part 60, Subpart K	"Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978"
40 CFR Part 60, Subpart Kb	"Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984"
40 CFR Part 60, Subpart XX	"Standards of Performance for Bulk Gasoline Terminals"
40 CFR Part 63, Subpart A	"General Provisions"
40 CFR Part 63, Subpart BBBB	"National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities"
40 CFR Part 63, Subpart WW	"National Emission Standards for Storage Vessels (Tanks) - Control Level 2"
40 CFR Part 63, Subpart ZZZZ	"National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"
40 CFR Part 68, Subpart G	Risk Management Plan
40 CFR Part 70	"State Operating Permit Programs"
40 CFR Part 82	"Protection of Stratospheric Ozone"