

**OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION**

**MEMORANDUM**

**June 15, 2020**

**TO:** Phillip Fielder, P.E., Chief Engineer

**THROUGH:** Rick Groshong, Environmental Programs Manager,  
Compliance and Enforcement

**THROUGH:** Phil Martin, P.E., Manager, Existing Source Permits Section

**THROUGH:** Ryan Buntyn, P.E., Existing Source Permits Section

**FROM:** Amalia Talty, P.E., New Source Permits Section

**SUBJECT:** Evaluation of Permit Application No. **2018-1651-TVR2**  
Phillips 66 Pipeline LLC  
Ponca City Pipeline Activities  
Facility ID No.: 331  
Sections 33 & 34, Township 26N, Range 2E  
Sections 3 & 4, Township 25N, Range 2E, Kay County, Oklahoma  
Latitude 36.680°N, Longitude 97.080°W  
Address: 1000 S. Pine (Hwy 60 & Waverly), Ponca City, OK 74602

**SECTION I. INTRODUCTION**

Phillips 66 Pipeline, LLC. (Phillips 66) has requested the renewal of the Title V Operating Permit for their transportation facilities located in Ponca City, Oklahoma. These facilities include the Ponca City South Tank Farm, Products Terminal and Cherokee Pump Station. The facility is currently operating under Permit No. 2013-0453-TVR issued on May 3, 2014. As part of this renewal application, Phillips 66 is requesting several updates to permit conditions, none of which require a modification or construction permit. These updates are as follows;

- Remove seven (7) tanks from the permit that have been physically removed from the facility;
- Update flare emissions using current calculations and methods. No physical change or throughput is occurring, and while emissions in the memorandum are changing, there has been no change to the Specific Conditions;
- Remove the annual throughput limits in the permit for tanks T-614 and T-615 in EUG TNK 3. Phillips 66 submitted an Operational Flexibility Notification on March 6, 2016; and Compliance and Enforcement has approved their request to remove said throughput limits;

- Correct a Specific Condition numbering discrepancy; as there are two (2) Specific Conditions with the same number six (6); and
- Update the permit condition related to Title 40 Code of Federal Regulations (40 CFR) Part 63 Subpart CC to reflect the applicable regulations as revised on December 1, 2015, and July 13, 2016.

Phillips owns and operates the Ponca City Refinery (PCR) and associated support activities located just south of Ponca City, Oklahoma. The refinery operations are covered by Title V Permit No. 98-104-TV (M-16) issued on August 17, 2015. This permit covers the activities of the Phillips Pipeline Group that support the transportation of non-processed petroleum into and finished products out of the PCR.

Phillips has acknowledged that the PCR (SIC 2911) and pipeline activities are considered collocated facilities and part of a single facility site for the purpose of emissions evaluation and regulatory applicability. Future permitting and modifications of the pipeline activities and associated permits need to be based on the combined emissions from both operations and need to be considered prior to making a determination for each permitting action. Applicability of each operation to Part 70 requirements or New Source Review (NSR) requirements should also be based on the combined emissions of the PCR and the pipeline activities.

The facility site is an existing PSD major stationary source and a major source for emissions of hazardous air pollutants (HAP).

Since the facility emits more than 100 TPY of a regulated pollutant, it is subject to Title V permitting requirements.

## **SECTION II. PERMIT HISTORY**

2006-206-TV: Initial Title V permit issued on April 15, 2008. This permit merged three (3) existing facilities (Fac No: 330, 331, and 5999) into a single permit.

2006-206-TV (M-1): Minor modification issued on August 10, 2010 to increase the combined throughput limit of two (2) tanks.

2006-206-TV (M-2): Administrative Amendment to change company name/ownership issued on August 29, 2012.

2013-0453-TVR: Title V renewal issued on June 3, 2014.

## **SECTION III. FACILITY DESCRIPTION**

The pipeline activities are divided into three main areas based on the layout of the operations: Ponca City South Tank Farm (PCSTF), Ponca City Products Terminal (PCPT), and Cherokee Pump Station (CP). The facility transports crude oil and other hydrocarbon liquids to the refinery where they are converted into a variety of saleable products such as liquid fuels, LP gas, and feedstocks for other industries. Saleable products are blended in the gasoline blending, diesel blending, and jet fuel blending processes and delivered via pipelines or via the truck load-out station.

The following is a general description of the Ponca City Pipeline operations.

**Crude Oil**

Approximately 99% of the crude oil to be processed at the PCR arrives via pipelines.

**Storage Tanks**

Crude oil is held in storage tanks until it is required for processing in the PCR. Also, five (5) 470-bbl denatured ethanol storage tanks may be constructed at the PCPT as insignificant activities per permit #91-031-AD (M-3).

**Products**

Petroleum products are delivered to customers by pipeline, rail, and road (trucks). The vast majority of products from the PCR are delivered by pipeline to distribution terminals in the mid-continent region of the United States. There is also a loading rack for transferring products to trucks for delivery. Loading emissions are collected and routed to a flare.

**HAP Content**

The facility does not presently store any liquids with a maximum true vapor pressure greater than or equal to 1.5 psia or an annual true vapor pressure greater than or equal to 1.2 psia and with more than 4 wt% annual average HAP's. Therefore, all the tanks are presently considered Group 2 storage vessels under National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart CC (Refinery MACT I) and are not subject to control standards. However, the facility may store liquids not meeting the Group 2 storage vessel criteria in the future and has requested that specific conditions be in the permit requiring compliance with the control standards for Group 1 storage vessels if such liquids are stored. The permittee will be required to notify DEQ when a Group 2 storage vessel is put into Group 1 service.

**IV. EQUIPMENT**

Emission units (EUs) have been arranged into Emission Unit Groups (EUGs) as shown below.

- EUG TNK-1: Tanks subject to 40 CFR Part 63 Subpart CC (Refinery MACT I) and some subject to 40 CFR Part 63 Subpart R (Gasoline Distribution MACT) that were constructed/modified prior to December 28, 1974, and are not subject to OAC 252:100 Subchapter 37
- EUG TNK-2: Tanks subject to 40 CFR Part 63 Subpart CC (Refinery MACT I) that were constructed/modified after December 28, 1974, and are subject to OAC 252:100 Subchapter 37
- EUG TNK-3: Tanks subject to 40 CFR Part 60 Subpart Kb
- EUG FLR-1: Flares subject to 40 CFR Part 63 Subpart A and Subpart R
- EUG LOD-1: Loading racks subject to 40 CFR Part 63 Subpart CC and Subpart R and 40 CFR Part 60 Subpart XX
- EUG CLN-1: Tank cleaning
- EUG FUG-1: Fugitive equipment leaks subject to 40 CFR Part 63 Subpart R
- EUG FUG-2: Fugitive equipment leaks subject to 40 CFR Part 63 Subpart CC

Tank contents will vary depending upon refinery requirements but will be limited by the suitability of a particular tank for a particular hydrocarbon. Roof types noted are external floating roof (EFR), internal floating roof (IFR), and fixed roof (FXR).

Unless otherwise specified, EU ID and Point ID are preceded by PCSTF (Ponca City South Tank Farm).

**EUG TNK-1 40 CFR Part 63 Subpart CC storage vessels; some subject to 40 CFR Part 63 Subpart R; and none subject to Subchapter 37**

EU ID	Point ID	Normal Contents	Capacity (gallons)	Roof Type	Const/Mod Date
T-609	T-609	Crude Oil/Gas Oil	2,957,682	EFR	1952
T-610	T-610	Crude Oil	2,957,220	EFR	1951
T-613	T-613	Crude Oil	2,944,830	EFR	1923
T-616	T-616	Crude Oil <sup>(1)</sup>	2,853,732	IFR	1924
T-617	T-617	Crude Oil	2,956,380	EFR	1951
T-618	T-618	Crude Oil	2,935,884	EFR	1923
T-620	T-620	Crude Oil	2,957,640	EFR	1920
T-621	T-621	Crude Oil	2,958,144	EFR	1923
T-625	T-625	Crude Oil	2,964,696	EFR	1950
T-626	T-626	Crude Oil	2,963,856	EFR	1923
T-627	T-627	Crude Oil	2,956,968	EFR	1949
T-629	T-629	Crude Oil	2,715,090	EFR	1969
T-630	T-630	Crude Oil	2,715,090	EFR	1969
T-631	T-631	Crude Oil	2,930,508	EFR	1923
PCPT T-5	PCPT T-5 <sup>(2)</sup>	Transmix <sup>(3)</sup>	18,312	FXR	1973
CP-1	CP-1 <sup>(2)</sup>	Transmix <sup>(3)</sup>	8,820	FXR	Pre 1974
CP-2	CP-2 <sup>(2)</sup>	Transmix <sup>(3)</sup>	8,820	FXR	Pre 1974

1. Assumed contents of currently Out Of Service (OOS) tanks
2. Tanks are subject to NESHAP Subpart R, Gasoline Distribution MACT, but not subject to any control standards.
3. Transmix is a mixture of different petroleum products that are stored pending reprocessing.

**EUG TNK-2: 40 CFR Part 63 Subpart CC storage vessels, subject to Subchapter 37**

EU ID	Point ID	Normal Contents	Capacity (gallons)	Roof Type	Const/Mod Date
PCPT E-1	PCPT E-1	Denatured Ethanol	19,740	FXR	2008
PCPT E-2	PCPT E-2	Denatured Ethanol	19,740	FXR	2008
PCPT E-3	PCPT E-3	Denatured Ethanol	19,740	FXR	2008
PCPT E-4	PCPT E-4	Denatured Ethanol	19,740	FXR	2008
PCPT E-5	PCPT E-5	Denatured Ethanol	19,740	FXR	2008

**EUG TNK-3: 40 CFR Part 60 Subpart Kb**

EU ID	Point ID	Normal Contents	Capacity (gallons)	Roof Type	Const/Mod Date
T-614	T-614	Crude Oil	2,951,466	EFR	1923 / 2013
T-615	T-615	Crude Oil	2,944,074	EFR	1923 / 2008

**EUG FLR-1: Flares subject to 40 CFR Part 63 Subpart A and Subpart R**

EU ID	Point ID	Equipment	Const/Mod Date
Flare-PT	Flare-PT	Truck Rack Flare	Pre 1973

**EUG LOD-1: Loading racks Subject to 40 CFR Part 63 Subpart CC and Subpart R and 40 CFR Part 60 Subpart XX**

EU ID	Point ID	Equipment	Const/Mod Date
Load-PT	Load-PT	Loading Rack	1989

**EUG CLN-1: Tank cleaning**

EU ID	Point ID	Equipment	Const/Mod Date
PCSTF-TC	PCSTF-TC	Tank Cleaning Materials	NA

**EUG FUG-1: Fugitive equipment leaks subject to 40 CFR Part 63 Subpart R**

EU ID	Point ID	Equipment	Number of Items	Const/Mod Date
Loading Rack Fugitive Leaks	Loading Rack Fugitive Leaks	Light Liquid Valves	573	Various
		Heavy Liquid Valves	88	Various
		Light Liquid Pump Seals	20	Various
		Heavy Liquid Pump Seals	0	Various
		Light Liquid Connectors	1951	Various
		Heavy Liquid Connectors	270	Various
		Light Liquid Other	203	Various
		Heavy Liquid Other	15	Various

**EUG FUG-2: Fugitive equipment leaks subject to 40 CFR Part 63 Subpart CC**

EU ID	Point ID	Equipment	Number of Items	Const/Mod Date
Piping Equipment Fugitive Leaks (non loading rack)	Piping Equipment Fugitive Leaks (non loading rack)	Light Liquid Valves	573	Various
		Heavy Liquid Valves	0	Various
		Light Liquid Pump Seals	44	Various
		Heavy Liquid Pump Seals	0	Various
		Vapor	5	Various
		Light Liquid Connectors	4370	Various
		Heavy Liquid Connectors	0	Various
		Light Liquid Other	121	Various
		Heavy Liquid Other	0	Various

**SECTION V. STACK PARAMETERS**

The following stack parameters, used for SO<sub>2</sub> air impacts modeling, were obtained from the PSD permit application for Permit No. 2003-336-C (M-2) PSD.

Description	UTM E (m)	UTM N (m)	Elevation (m)	Height (m)	Temp (°K)	Velocity (m/s)	Diameter (m)
Flare-Truck Terminal	670,457	4,061,036	305	15.24	1,273	20.0	0.32

**SECTION VI. EMISSIONS**

Emissions estimates are based on the pipeline activities operating 24 hours per day, every day of the year. Emission estimates are the potential to emit (PTE) and were either calculated using the maximum inherent pipeline process unit throughputs or permit limited process unit or individual source throughputs.

**TANKS**

Tank emissions (except for denatured ethanol tanks) were estimated using the EPA program TANKS 4.09d and based on a future expected processing rate of 250,000 barrels/day. For out of service tanks where historic data was unavailable, throughputs were estimated based on the throughputs of other similar tanks. VOC emissions from the denatured ethanol tanks are based on TANKS 4.09d and a maximum throughput of 1,840,000 gallons per year per tank. For flexibility of operations, the facility has requested a combined throughput limit of  $5 * 1,840,000 = 9,200,000$  gal/year for this group of tanks.

**EUG TNK-1: 40 CFR Part 63 Subpart CC storage vessels; some subject to 40 CFR Part 63 Subpart R; and none subject to Subchapter 37**

EU ID <sup>(1)</sup>	Point ID	Normal Contents	Throughput (gal/yr)	VOC Emissions	
				lb/hr	TPY
T-609	T-609	Crude Oil/Gas Oil	186,000,000	1.86	8.2
T-610	T-610	Crude Oil	186,000,000	1.83	8.0
T-613	T-613	Crude Oil	186,000,000	1.83	8.0
T-616	T-616	Crude Oil <sup>(2)</sup>	186,000,000	1.83	8.0
T-617	T-617	Crude Oil	186,000,000	1.83	8.0
T-618	T-618	Crude Oil	186,000,000	1.83	8.0
T-620	T-620	Crude Oil	186,000,000	1.83	8.0
T-621	T-621	Crude Oil	186,000,000	2.02	8.8
T-625	T-625	Crude Oil	186,000,000	1.44	6.3
T-626	T-626	Crude Oil	186,000,000	1.44	6.3
T-627	T-627	Crude Oil	186,000,000	1.45	6.3
T-629	T-629	Crude Oil	186,000,000	1.44	6.3
T-630	T-630	Crude Oil	186,000,000	1.44	6.3
T-631	T-631	Crude Oil	186,000,000	1.44	6.3
PCPT T-5	PCPT T-5 <sup>(3)</sup>	Transmix	210,000	1.00	4.3
CP-1	CP-1 <sup>(3)</sup>	Transmix	168,000	0.37	1.6
CP-2	CP-2 <sup>(3)</sup>	Transmix	168,000	0.37	1.6
<b>TOTAL</b>			<b>2,604,546,000</b>	<b>25.25</b>	<b>110.3</b>

1. All these tanks are “grandfathered” and have no permit limits for emissions or throughput with the exception of tanks PCPT T-5, CP-1, and CP-2.
2. Assumed contents of currently Out of Service tanks.
3. Tanks are subject to NESHAP Subpart R, Gasoline Distribution MACT, but not subject to any control standards.

**EUG TNK-2: 40 CFR Part 63 Subpart CC storage vessels, subject to Subchapter 37**

EU ID	Point ID	Normal Contents	Throughput (gal/yr)	VOC Emissions	
				lb/hr	TPY
PCPT E-1	PCPT E-1	Denatured Ethanol	9,200,000	0.80	3.50
PCPT E-2	PCPT E-2	Denatured Ethanol			
PCPT E-3	PCPT E-3	Denatured Ethanol			
PCPT E-4	PCPT E-4	Denatured Ethanol			
PCPT E-5	PCPT E-5	Denatured Ethanol			

**EUG TNK-3: 40 CFR Part 60 Subpart Kb storage vessels**

EU ID	Point ID	Normal Contents	Throughput <sup>1</sup> (gal/yr)	VOC Emissions	
				lb/hr	TPY
T-614	T-614	Crude Oil	186,000,000	1.83	8.0
T-615	T-615	Crude Oil	186,000,000	1.83	8.0
<b>TOTAL</b>			<b>372,000,000</b>	<b>3.66</b>	<b>16.00</b>

1. No Permit limits for emissions or throughputs

**FLARE(S)**

Flare NO<sub>x</sub> and CO emissions were calculated using factors taken from Texas Commission on Environmental Quality (TCEQ) Air Permit Technical Guidance for Chemical Sources: Flares and Vapor Oxidizers Table 4 (Oct 2000 – RG-109). VOC emissions are based on 98% control efficiency of the controlled loading loss emissions. Sulfur dioxide flare emissions were calculated using a mass balance for H<sub>2</sub>S and 100% conversion and are negligible.

**EUG FLR-1: Flares subject to 40 CFR Part 63 Subpart A, Subpart R, and Subpart CC**

EU ID	Point ID	Heat Rate (MMBtu/hr)	Pollutant	EF (lb/MMBtu)	Emissions	
					lb/hr	TPY
Flare-PT	Flare-PT	3.9	NO <sub>x</sub>	0.1380	0.54	2.4
			CO	0.2755	1.07	4.7
			SO <sub>2</sub>	-	-	-
			VOC	-	4.20	18.42
			PM <sub>10</sub>	-	-	-

**LOADING**

The loading rack emissions were calculated from AP-42(6/08) 5.2. They are controlled with a dedicated vapor balance service with a collection efficiency of 98%. The collected emissions are sent to a flare (Flare-PT)

**Loading Parameters**

Parameter	Gasoline	Diesel
Throughput, gal/yr	207,518,447	142,881,553
Loading Saturation Factor	1	1
Temp., °R	522.66	522.66
TVP, psia	5.67	0.008
MW, lb/lbmol	67	130
Emission Factor, lb/10 <sup>3</sup> gal	9.06	0.024



**EUG LOD-1: Loading racks Subject to 40 CFR Part 63 Subpart CC and 40 CFR Part 60 Subpart XX**

EU ID	Point ID	Process	Throughput (gal/yr)	VOC Emissions <sup>(1)</sup>	
				lb/hr	TPY
Load-PT	Load-PT	Loading Rack – Gasoline	207,518,447	5.74	18.79
		Loading Rack - Diesel	142,881,553	0.01	0.03
<b>TOTAL</b>			<b>350,400,000</b>	<b>5.75</b>	<b>18.82</b>

1. 2% of the potential uncontrolled emissions from loading losses.

**TANK CLEANING**

Emissions from cleaning of tanks for maintenance purposes are considered a Trivial Activity. The applicant supplied a conservative estimate for informational purposes only.

**EUG CLN-1: Tank cleaning**

EU ID	Point ID	Process	Throughput (gal/yr)	VOC Emissions	
				lb/hr	TPY
PCSTF-TC	PCSTF-TC	Tank Cleaning	N/A	-	15.00

**FUGITIVES**

VOC emissions from fugitive components (valves, flanges, pump seals, etc.) were estimated using emission factors that were developed specifically for the Ponca City Refinery. The factors are listed in Table 2-1 in a March 1, 1991 letter from Phillips to DEQ titled “Refinery Specific Fugitive Emission Factors – Ponca City Refinery.”

**EUG FUG-1: Fugitive equipment leaks subject to 40 CFR Part 63 Subpart R**

EU ID	Point ID	Equipment	Number of Items	Emission Factor (lb/hr-source)	VOC Emissions	
					lb/hr	TPY
Loading Rack Fugitive Leaks	Loading Rack Fugitive Leaks	LL Valves	573	0.0000948	0.054	0.24
		HL Valves	88	0.0000948	0.008	0.04
		LL Pump Seals	20	0.00119	0.024	0.10
		HL Pump Seals	0	0.00119	-	-
		LL Connectors	1951	0.0000176	0.034	0.15
		HL Connectors	270	0.0000176	0.005	0.02
		LL Other	203	0.000286	0.058	0.25
		HL Other	15	0.000286	0.004	0.02
<b>SUBTOTAL</b>					<b>0.19</b>	<b>0.82</b>

LL = Light Liquid  
HL = Heavy Liquid

**EUG FUG-2: Fugitive equipment leaks subject to 40 CFR Part 63 Part CC**

EU ID	Point ID	Equipment	Number of Items	Emission Factor (lb/hr-source)	VOC Emissions	
					lb/hr	TPY
Piping Equipment Fugitive Leaks (non loading rack)	Piping Equipment Fugitive Leaks (non loading rack)	LL Valves	573	0.0000948	0.054	0.24
		HL Valves	0	0.0000948	-	-
		LL Pump Seals	44	0.00119	0.052	0.23
		HL Pump Seals	0	0.00119	-	-
		Vapor	5	0.0000925	0.0	0.0
		LL Connectors	4370	0.0000176	0.077	0.34
		HL Connectors	0	0.0000176	-	-
		LL Other	121	0.000286	0.035	0.15
		HL Other	0	0.000286	-	-
<b>SUBTOTAL</b>					<b>0.22</b>	<b>0.96</b>

LL = Light Liquid  
HL = Heavy Liquid

**Summary of Potential Emissions**

EUG	NO <sub>x</sub>		CO		VOC	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
EUG TNK-1	--	--	--	--	25.25	110.3
EUG TNK-2	--	--	--	--	57.70	33.90
EUG TNK-3	--	--	--	--	3.66	16.00
EUG FLR-1	0.54	2.4	1.07	4.7	4.20	18.42
EUG LOD-1	--	--	--	--	5.75	18.80
EUG CLN-1	--	--	--	--	--	15.00
EUG FUG-1	--	--	--	--	0.19	0.82
EUG FUG-2	--	--	--	--	0.22	0.96
<b>TOTAL</b>	<b>0.54</b>	<b>2.4</b>	<b>1.07</b>	<b>4.7</b>	<b>96.97</b>	<b>214.20</b>

**HAP Emissions**

Total facility HAP emissions as reported in the 2011 annual emissions inventory for the pipeline activities are shown below. The facility is minor for HAP emissions but is collocated with the refinery which is a major source for HAP; therefore, the facility is subject to applicable NESHAP standards.

HAP Name	TPY
2,2,4-Trimethylpentane	0.13
Benzene	1.19
Cumene	0.01
Ethyl Benzene	0.09
Hexane	7.79

HAP Name	TPY
Toluene	0.69
Xylenes	0.18
MTBE	0.00
<b>TOTAL</b>	<b>10.08</b>

**Greenhouse Gases [GHG]**

The collocated facilities are a PSD-major source for emissions for GHG.

**SECTION VII. INSIGNIFICANT ACTIVITIES**

The insignificant activities identified and justified in the application and listed in OAC 252:100-8, Appendix I, are shown below. Recordkeeping for activities indicated with “\*” is listed in the Specific Conditions. Some insignificant activities listed below were not in operation at the time of the application. Other future activities that qualify as insignificant activities per OAC 252:100-8 Appendix I, which are not specifically listed below, may be conducted in the future without notification to DEQ. The permittee will be required to maintain records that demonstrate the activity is an insignificant activity.

- \* Stationary reciprocating engines burning natural gas, gasoline, aircraft fuels, or diesel fuel, which are either used exclusively for emergency power generations or for peaking power service not exceeding 500 hours per year.
- Space heaters, boilers, process heaters and emergency flares less than or equal to 5 MMBtu/hr heat input (commercial natural gas).
- Emissions from stationary internal combustion engines rated less than 50 HP output. The facility does not currently operate stationary internal combustion engines meeting the criteria in this category but may do so in the future.
- \* Emissions from fuel storage/dispensing equipment operated solely for facility owned vehicles if fuel throughput is not more than 2,175 gallons/day, averaged over a 30-day period.
- \* Storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature.
- \* Emissions from storage tanks constructed with a capacity less than 39,894 gallons which store VOC with a vapor pressure less than 1.5 psia at maximum storage temperature.
- Additions or upgrades of instrumentation or control systems that result in emissions increases less than the pollutant quantities specified in OAC 252:100-8-3(e)(1).

- Cold degreasing operations utilizing solvents that are denser than air. These are part of facility maintenance operations, which is a “trivial activity”; therefore, no recordkeeping is required.
- Welding and soldering operations utilizing less than 100 pounds of solder and 53 tons per years of electrodes. These are conducted as part of facility maintenance, which is a “trivial activity”; therefore, no recordkeeping is required.
- Torch cutting and welding of less than 200,000 tons of steel fabricated. These are conducted as part of facility maintenance, which is a “trivial activity”; therefore, no recordkeeping is required.
- Site restoration and/or bioremediation activities of <5 years expected duration.
- Hydrocarbon-contaminated soil aeration pads utilized for soils excavated at the facility only.
- Emissions from operation of groundwater remediation wells including but not limited to emissions from venting, pumping, and collecting activities subject to de minimis limits for HAP (Section 112(b) of CAAA90).
- Hazardous waste and hazardous materials drum staging areas. The facility includes a staging area for drummed hazardous wastes.
- Sanitary sewage collection and treatment facilities other than incinerators and Publicly Owned Treatment Works (POTW). Stacks or vents for sanitary sewer plumbing traps are also included (i.e., lift station).
- Emissions from landfills and land farms unless otherwise regulated by an applicable state or federal regulation.
- Surface coating operations that do not exceed a combined total usage of more than 60 gallons/month of coatings/thinners, and clean-up solvents at any one emission unit. These are conducted as part of facility maintenance, which is a “trivial activity”; therefore, no recordkeeping is required.
- Exhaust systems for chemical, paint, and/or solvent storage rooms or cabinets, including hazardous waste satellite (accumulation) areas.
- Hand wiping and spraying of solvents from containers with less than 1-liter capacity used for spot cleaning and/or degreasing in ozone attainment areas. This is conducted as part of facility maintenance, which is a “trivial activity”; therefore, no recordkeeping is required.
- \* Activities having the potential to emit no more than 5 TPY (actual) of any criteria pollutant. Propane truck loading is conducted at the Product Terminal adjacent to the truck rack. This is considered an insignificant activity with estimated VOC emissions of approximately 3 TPY from loading hose losses. In the near future, the facility may add several non-New Source

Performance Standards (NSPS) Kb tanks (less than 19,813 gallon capacity) for storage of denatured ethanol with estimated emissions of less than 1 TPY per tank.

## VI. OKLAHOMA AIR POLLUTION CONTROL RULES

OAC 252:100-1 (General Provisions) [Applicable]  
Subchapter 1 includes definitions but there are no regulatory requirements.

OAC 252:100-2 (Incorporation by Reference) [Applicable]  
This subchapter incorporates by reference applicable provisions of Title 40 of the Code of Federal Regulations listed in OAC 252:100, Appendix Q. These requirements are addressed in the “Federal Regulations” section.

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]  
Subchapter 3 enumerates the primary and secondary ambient air quality standards and the significant deterioration increments. At this time, all of Oklahoma is in “attainment” of these standards.

OAC 252:100-5 (Registration, Emissions Inventory and Annual Operating Fees) [Applicable]  
Subchapter 5 requires sources of air contaminants to register with Air Quality, file emission inventories annually, and pay annual operating fees based upon total annual emissions of regulated pollutants. Emission inventories were submitted and fees paid for previous years as required.

OAC 252:100-7 (Permits for Minor Facilities) [Not Applicable]  
Subchapter 7 sets forth the permit application fees and the basic substantive requirements for permits for minor facilities. However, Subchapter 7 previously contained the requirements for construction and operation of major sources also. The facility has been issued numerous permits since promulgation of the permitting rule (October, 1972). The requirements of the several permits are incorporated into the Title V permit.

OAC 252:100-8 (Permits for Part 70 Sources) [Applicable]  
Part 5 includes the general administrative requirements for Part 70 permits. Any planned changes in the operation of the facility that result in emissions not authorized in the permit and that exceed the “Insignificant Activities” or “Trivial Activities” thresholds require prior notification to AQD and may require a permit modification. Insignificant activities refer to those individual emission units either listed in Appendix I or whose actual calendar year emissions do not exceed the following limits.

- 5 TPY of any one criteria pollutant
- 2 TPY of any one hazardous air pollutant (HAP) or 5 TPY of multiple HAP or 20% of any threshold less than 10 TPY for a HAP that the EPA may establish by rule

Emission limitations and operational requirements necessary to assure compliance with all other applicable requirements for all sources are taken from the initial TV permit, from the various modifications based on the initial TV permit, from the TVR and construction permit applications, Civil Action No. 08-CV 020-D, or are developed from the applicable requirement.

OAC 252:100-9 (Excess Emissions Reporting Requirements) [Applicable]  
Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emission event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event. Request for mitigation, as described in OAC 252:100-9-8, shall be included in the excess emission event report. Additional reporting may be required in the case of ongoing emission events and in the case of excess emissions reporting required by 40 CFR Parts 60, 61, or 63.

OAC 252:100-13 (Open Burning) [Applicable]  
Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in this subchapter.

OAC 252:100-19 (Particulate Matter) [Not Applicable]  
This subchapter specifies particulate emission limits for fuel-burning equipment and industrial processes. A flare is not considered fuel burning equipment and the facilities have no other fuel combustion equipment; therefore, this subchapter is not applicable.

OAC 252:100-25 (Visible Emissions and Particulates) [Applicable]  
No discharge of greater than 20% opacity is allowed except for short-term occurrences, which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity. The requirements from this subchapter have been incorporated into the Standard Conditions of the permit.

OAC 252:100-29 (Fugitive Dust) [Applicable]  
No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. Heavy traffic areas, including the racks and the offices, are paved. Vehicular traffic in the unpaved areas is greatly restricted for safety reasons. Under normal operating conditions, this facility will not cause fugitive dust problems, therefore it is not necessary to require specific precautions to be taken.

OAC 252:100-31 (Sulfur Compounds) [Applicable]  
Part 2, Section 31-7 limits emissions of sulfur dioxide from any one existing source or any one new petroleum and natural gas process source subject to OAC 252:100-31-26(a)(1). Ambient air concentration of sulfur dioxide at any given point shall not be greater than 1,300  $\mu\text{g}/\text{m}^3$  in a 5-minute period of any hour, 1,200  $\mu\text{g}/\text{m}^3$  for a 1-hour average, 650  $\mu\text{g}/\text{m}^3$  for a 3-hour average, or 130  $\mu\text{g}/\text{m}^3$  for a 24-hour average. Part 2 also limits the ambient air impact of hydrogen sulfide emissions from any new or existing source to 0.2 ppm for a 24-hour average (equivalent to 280  $\mu\text{g}/\text{m}^3$ ). Compliance with the Part 2  $\text{SO}_2$  standards for the refinery has been demonstrated in

previous PSD permit applications through air modeling. The pipeline activities do not include any source with significant emissions of SO<sub>2</sub>. All the tanks storing crude oil have low VOC emissions; therefore, H<sub>2</sub>S emissions even with storage of sour crude oil would be minimal and not have an air impact above the 0.2 ppm standard.

Part 5, Section 31-25 limits sulfur dioxide emissions from new petroleum or natural gas process equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/MMBtu heat input averaged over 3 hours. There is no applicable process equipment at the pipeline activities.

Part 5, Section 31-26(2) also limits hydrogen sulfide emissions from new petroleum or natural gas process equipment (constructed after July 1, 1972). Removal of hydrogen sulfide in the exhaust stream, or oxidation to sulfur dioxide, is required unless hydrogen sulfide emissions would be less than 0.3 lb/hr for a two-hour average. Hydrogen sulfide emissions shall be reduced by a minimum of 95% of the hydrogen sulfide in the exhaust gas. Direct oxidation of hydrogen sulfide is allowed for units whose emissions would be less than 100 lb/hr of sulfur dioxide for a two-hour average. There is no applicable process equipment at the pipeline activities covered under this permit.

OAC 252:100-33 (Nitrogen Oxides)

[Not Applicable]

This subchapter applies to fuel burning equipment, constructed or modified after February 14, 1972, with a rated heat input greater than or equal to 50 MMBtu/hr. Gas-fired equipment is limited to emissions of 0.20 lbs of NO<sub>x</sub> per MMBtu, 3-hour average. Liquid fuel-fired equipment is limited to emissions of 0.30 lb of NO<sub>x</sub> per MMBtu, 3-hour average. The facility does not operate liquid fuel-fired heaters, boilers, or engines with a heat input greater than or equal to 50 MMBtu/hr. A flare does not meet the definition of “fuel burning equipment” and there are no other combustion sources at the pipeline activities covered under this permit.

OAC 252:100-35 (Carbon Monoxide)

[Not Applicable]

None of the following affected processes are located at this facility: gray iron cupola, blast furnace, basic oxygen furnace, petroleum catalytic cracking unit, or petroleum catalytic reforming unit.

OAC 252:100-37 (Volatile Organic Compounds)

[Part 3 and Part 7 Applicable]

Part 3 requires storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. Part 3 also requires storage tanks constructed after December 28, 1974, with a capacity of more than 40,000 gallons and storing a VOC with a vapor pressure greater than 1.5 psia to be equipped with either an external floating roof, a fixed roof with an internal floating cover, a vapor recovery system, or other equally effective control methods approved by the DEQ. Tanks subject to the equipment standards of either NSPS or NESHAP are exempt from these requirements. Any denatured ethanol storage tanks not subject to NSPS must also be equipped with submerged fill.

Part 3 applies to VOC loading facilities constructed after December 24, 1974. Facilities with a throughput greater than 40,000 gallons/day are required to be equipped with a vapor-collection and disposal system unless all loading is accomplished by bottom loading with the hatches of the tank truck or trailer closed. The loading rack has the potential to load more than 40,000 gallons per day and complies with Subchapter 37 by having a vapor-collection system and flare for combustion of VOC.

Part 5 limits the VOC content of coating operations. This facility does not normally conduct coating or painting operations except for routine maintenance of the facility and equipment, which is exempt.

Part 7 requires all VOC gases from a vapor recovery blowdown system to be burned by a smokeless flare or equally effective control device unless it is inconsistent with the “Minimum Federal Safety Standards for the Transportation of Natural and Other Gas by Pipeline” or any State of Oklahoma regulatory agency. The pipeline activities do not use a vapor recovery blowdown system.

Part 7 requires fuel-burning and refuse-burning equipment to be operated and maintained so as to minimize emissions of VOCs. Temperature and available air must be sufficient to provide essentially complete combustion. This rule applies to facility heaters and boilers constructed or modified after December 24, 1974. The pipeline activities do not include any equipment subject to this rule.

Part 7 requires effluent water separator openings or floating roofs to be sealed or equipped with an organic vapor recovery system. The pipeline activities do not include any equipment subject to this rule.

OAC 252:100-42 (Toxic Air Contaminants (TAC)) [Applicable]  
 This subchapter regulates toxic air contaminants (TAC) that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC, shall be retained unless a modification is approved by the Director. Since no AOC has been designated anywhere in the state, there are no specific requirements for this facility at this time.

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping) [Applicable]  
 This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

**The following Oklahoma Air Pollution Control Rules are not applicable to this facility:**

OAC 252:100-11	Alternative Emissions Reduction	not requested
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OAC 252:100-15	Mobile Sources	not in source category
OAC 252:100-17	Incinerators	not type of emission unit
OAC 252:100-23	Cotton Gins	not type of emission unit
OAC 252:100-24	Grain, Feed, or Seed Operations	not in source category
OAC 252:100-39	Nonattainment Areas	not in area category
OAC 252:100-47	Landfills	not in source category

## VII. FEDERAL REGULATIONS

PSD, 40 CFR Part 52

[Not Applicable]

The total refinery site is a PSD major stationary source for NO<sub>x</sub>, CO, SO<sub>2</sub>, VOC, and PM<sub>10</sub>. Any future increases in emissions from any of the collocated facilities within the refinery site must be evaluated for PSD significance levels: 40 TPY NO<sub>x</sub>, 100 TPY CO, 40 TPY SO<sub>2</sub>, 40 TPY VOC, 15 TPY PM<sub>10</sub>, 10 TPY Total Reduced Sulfur, or 0.6 TPY lead.

NSPS, 40 CFR Part 60

[Subparts A, Kb and XX are Applicable]

Subpart A, General Provisions. This subpart requires submittal of notifications for NSPS-affected sources related to commencement of construction, initial startup, and initial performance testing. This subpart also contains general recordkeeping, monitoring and testing requirements. These requirements apply to equipment subject to NSPS regulations, unless otherwise specified by those subparts. Subpart A also specifies general control device requirements for control devices used to comply with applicable NSPS subparts. However, Subpart XX does not provide any reference to the control device standards of 40 CFR 60.18; therefore, the facility flare is not subject to the control device requirements of this subpart.

Subpart J (Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced prior to May 14, 2007) applies to the following affected facilities in petroleum refineries: fluid catalytic cracking unit catalyst regenerators, fuel gas combustion devices, and Claus sulfur recovery plants. The pipeline activities covered under this permit do not include fluid catalytic cracking unit catalyst regenerators or Claus sulfur recovery plants.

Subpart Ja (Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced after May 14, 2007) applies to the following affected facilities in petroleum refineries: fluid catalytic cracking unit catalyst regenerators, fuel gas combustion devices, and Claus sulfur recovery plants. The pipeline activities covered under this permit do not include fluid catalytic cracking unit catalyst regenerators or Claus sulfur recovery plants.

Subpart K (Storage Vessels for Petroleum Liquids) affects storage vessels for petroleum liquids which have a storage capacity greater than 40,000 gallons but less than 65,000 gallons and which commenced construction, reconstruction, or modification after March 8, 1974, or which have a capacity greater than 65,000 gallons which commenced construction, reconstruction, or modification after June 11, 1973, and prior to May 19, 1978. There are no tanks at the Pipeline Activities Facility that meet these criteria; therefore, Subpart K does not apply.

Subpart Ka (Storage Vessels for Petroleum Liquids) affects storage vessels for petroleum liquids that have a storage capacity greater than 40,000 gallons and which commenced construction, reconstruction, or modification after May 18, 1978, and prior to July 23, 1984. There are no tanks at the Pipeline Activities Facility that meet these criteria; therefore, Subpart Ka does not apply.

Subpart Kb (Volatile Organic Liquids Storage Vessels) applies to volatile organic liquids storage vessels for which construction, reconstruction, or modification commenced after July 23, 1984,

and which have a capacity of 19,812 gallons (40 cubic meters) or greater. Paragraph 60.112b (a) specifies that vessels with a design capacity greater than or equal to 39,980 gallons containing a VOL that, as stored, has a maximum true vapor pressure greater than or equal to 0.75 psia but less than 11 psia shall have one of the following vapor control devices: an external fixed roof in combination with an internal floating roof; an external floating roof; a closed vent system to a control device (flare, condenser, or absorber); or an equivalent system. Tanks T-614 and T-615 were constructed, reconstructed, or modified after July 23, 1984. Subpart Kb specifies the following standards for external floating roofs. The floating roof must be floating on the liquid surface except during initial fill or when the vessel is completely emptied. The floating roof must be equipped with closure devices between the wall of the vessel and the edge of the floating roof. Each opening in the floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, and stub drains is to be equipped with a cover or lid rim space to be closed at all times except when the device is in actual use. The cover or lid shall be bolted except when in use. Automatic bleeder vents shall be equipped with a gasket. Rim space vents shall be equipped with a gasket. The sample wells shall have a slit fabric cover which covers at least 90% of the opening. The secondary seal on an external floating roof shall be checked at least yearly for gaps. The secondary seal gap area to tank circumference ratio shall not exceed 1 square inch per foot of tank diameter nor shall any gap exceed 0.5 inches. The primary seal gap area to tank circumference ratio shall not exceed 10 square inch per foot of tank diameter nor shall any gap exceed 1.5 inches. Tanks T-614 and T-615 have external floating roofs and are constructed in compliance with all requirements. The permit requires compliance with all applicable requirement of this subpart.

Subpart XX (Bulk Gasoline Terminals) affects loading racks at bulk gasoline terminals, which deliver liquid product into gasoline tank trucks and that commenced construction or modification after December 17, 1980. Subpart XX affects the total of all the loading racks at a bulk gasoline terminal. "Loading rack" is defined as "the loading arms, pumps, meters, shutoff valves, relief valves, and other piping and valves necessary to fill delivery tanks trucks." The loading rack was modified after December 17, 1980; therefore, Subpart XX applies. The emissions from the vapor collection system due to the loading of liquid product into gasoline tank trucks shall not exceed 35 mg of TOC per liter of gasoline loaded. A pressure of 4.5 kPa shall not be exceeded in the loading equipment or vapor collection equipment during product loading. Work practices dealing with vapor tightness are specified. Certification of tank truck vapor tightness is required, and details of required recordkeeping are specified.

Subpart GGG (Equipment Leaks of VOC in Petroleum Refineries) affects each valve, pump, pressure relief device, sampling connection system, open-ended valve or line, and flange or other connector in VOC service at a process unit which commenced construction or modification after January 4, 1983, and which is located at a petroleum refinery. The pipeline activities do not contain any units which commenced construction or modification after January 4, 1983, nor are they considered process units; therefore, Subpart GGG is not applicable.

Subpart GGGa (Equipment Leaks of VOC in Petroleum Refineries) affects each valve, pump, pressure relief device, sampling connection system, open-ended valve or line, and flange or other connector in VOC service at a process unit which commenced construction or modification after November 7, 2006, and which is located at a petroleum refinery. The pipeline activities do not contain any units which commenced construction or modification after November 7, 2006, nor are they considered process units; therefore, Subpart GGGa is not applicable.

Subpart QQQ (VOC Emission from Petroleum Refinery Wastewater Systems) applies to individual drain systems, oil-water separators, and aggregate facilities located in a petroleum refinery and which commenced construction, modification, or reconstruction after May 4, 1987. Drains are required to be equipped with water seal controls. Junction boxes are required to be equipped with a cover and may have an open vent pipe. Sewer lines shall not be open to the atmosphere and shall be covered or enclosed in a manner so as to have no visual gaps or cracks in joints, seals, or other emission interfaces. The pipeline activities do not include operation of waste water systems; therefore, Subpart QQQ is not applicable.

NESHAP, 40 CFR Part 61

[Subpart A and FF Applicable]

Subpart A, General Provisions. This subpart requires submittal of notifications for NESHAP-affected sources related to commencement of construction, initial startup, and initial performance testing. This subpart also contains general recordkeeping, monitoring and testing requirements. These requirements apply to equipment subject to NESHAP Part 61 regulations, unless otherwise specified by those subparts.

Subpart J, Equipment Leaks of Benzene. This subpart applies to pumps, compressors, pressure relief devices, sampling connections, open-ended lines, valves, or flanges and other connectors, product accumulator vessels, and control devices or systems that are intended to operate in benzene service, which is defined as having more than 10% benzene by weight. The benzene concentration for each affected unit at the facility is less than 10% by weight and is not intended to operate in benzene service. Therefore, Subpart J is not applicable.

Subpart M applies to certain activities involving asbestos. The refinery engages in asbestos removal, demolition and disposal and is subject to the applicable standards in this subpart. The pipeline activities may engage in removal activities in the future and Subpart M would be applicable at that time, but is not presently applicable.

Subpart FF applies to waste streams at chemical manufacturing plants, coke-byproduct recovery plants, and petroleum refineries that have benzene-containing hazardous waste treatment, storage, and disposal facilities. Affected equipment at the facility includes tanks, containers, and individual drain systems. The stormwater collection system is segregated from the process sewer system and, therefore, is not subject to this subpart. However, Subpart FF is applicable to the tank water draw offs and any trucking containers used to transport waste streams from the facility.

NESHAP, 40 CFR Part 63

[Subparts A, R, and CC are Applicable]

Subpart A, General Provisions. This subpart requires submittal of notifications for NESHAP-affected sources related to commencement of construction, initial startup, and initial performance testing. This subpart also includes general provisions for operation and maintenance of affected equipment, startup, shutdown and malfunction plans, monitoring, recordkeeping and reporting. These requirements apply to equipment subject to NESHAP Part 63 regulations, unless otherwise specified by those subparts. Subpart A also specifies general control device requirements for control devices used to comply with applicable subparts. Standards for flares used to comply with emissions limitations are stated in 40 CFR 63.11. 40 CFR 63.11(b)(7) states that the maximum flare exit velocity shall be determined by the following equation:

$$\text{Log}_{10} (V_{\text{max}}) = (H_t + 28.8)/31.7$$

where  $H_t$  = the net heating value of the flared gas, MJ/SCM. 63.11(b) also requires that the flare be monitored for the presence of a pilot flame and that the flare be operated with no visible emissions. The facility operates a flare that is subject to this subpart since it controls HAP emissions from Subpart R affected equipment. The flare's pilot flame is monitored by thermocouples and the flare meets the design criteria specified.

Subpart R applies to bulk gasoline terminals with a throughput greater than 75,700 liters per day and pipeline breakout stations. Bulk gasoline terminals and pipeline breakout stations classified as SIC 2911 and located within a contiguous area and under common control with a refinery complying with 40 CFR Part 63 Subpart CC standards for storage vessels, equipment leaks standards, or gasoline loading racks, are not subject to Subpart R. As explained below, the storage tanks and equipment components at the pipeline activities are not subject to Subpart CC standards and are, therefore, subject to the standards of Subpart R. The gasoline loading rack is subject to Subpart CC, but that subpart requires compliance with the provisions for loading racks in Subpart R. Each owner or operator of a bulk gasoline terminal subject to the provisions of Subpart R that is also subject to applicable provisions of 40 CFR Part 60 Subpart Kb or Subpart XX must comply only with the provisions in each subpart that contain the most stringent control requirements for that facility. Tanks PCPT T-5, CP-1, and CP-2 do not have any applicable Subpart R requirements due to size. "Gasoline" is not defined specifically in Subpart R, but 40 CFR 63.421 states that "As used in this subpart, all terms not defined herein shall have the meaning given them in the Act, in subparts A, K, Ka, Kb, and XX of part 60 of this chapter, or in subpart A of this part." Subpart XX, 40 CFR 60.501, states "*Gasoline* means any petroleum distillate or petroleum distillate/alcohol blend having a Reid vapor pressure of 27.6 kilopascals or greater which is used as a fuel for internal combustion engines." The denatured ethanol at this facility has a Reid vapor pressure less than 4 psia (27.6 kPa) and, therefore, does not meet the definition of "gasoline" in 40 CFR 60.501. Therefore, the new denatured ethanol storage tanks and associated fugitive components are not subject to Subpart R.

Subpart CC establishes MACT standards for control of HAP from petroleum refineries. Affected equipment located at a plant site are subject to this subpart. The pipeline activities are considered collocated and part of the refinery site. Subpart CC affects process vents (except FCCUs and catalyst regenerators), storage vessels, wastewater streams and treatment operations, equipment leaks, gasoline loading racks, marine vessel loading operations, and storage vessels and equipment leaks associated with pipeline breakout stations. Of the affected equipment, storage tanks, equipment leaks, and a gasoline loading rack are present within the pipeline activities under this permit.

Storage tanks: Existing storage tanks equal to or larger than 10,567 gallons that store a liquid containing any HAP listed in Table 1 of the subpart are subject. Tanks that are greater than or equal to 47,000 gallons that store a liquid with a maximum true vapor pressure greater than or equal to 1.5 psia or an annual true vapor pressure greater than or equal to 1.2 psia and with more than 4 wt% annual average HAP are considered Group 1 storage vessels and are subject to control standards. All other tanks are Group 2 storage vessels and are not subject to control standards. All storage tanks at the pipeline activities presently contain less than 4 wt% HAP and, therefore, are Group 2 storage vessels and are not subject to the control standards of Subpart CC. However, the permittee has requested that specific conditions be included in the permit to address requirements for Group I storage vessels for future operation flexibility. The permittee is required by Subpart CC to keep records demonstrating the HAP content and vapor pressure of the liquids stored.

Storage tanks T-614 and T-615 are subject to 40 CFR Part 63 Subpart Kb and are exempt from this subpart.

Equipment Leaks: These standards affect valves, flanges, pumps, and compressors except for compressors in hydrogen service. Equipment components that contact a process stream containing 5 wt% or more HAP are subject to the LDAR standards. All hydrocarbon streams at the pipeline activities presently contain less than 4 wt% HAP and, therefore, the equipment components are not presently subject to LDAR controls under Subpart CC.

Gasoline Loading Terminal: The gasoline loading rack is subject to Subpart CC, which states that the owner or operator shall comply with the standards, test methods and procedures, monitoring, recordkeeping, and reporting requirements for loading racks in 40 CFR Part 63 Subpart R, but with the August 18, 1998, compliance deadline. Subpart R limits total VOC emissions to 10 mg per liter gasoline loaded, requires LDAR on meters, arms, and other components which may leak, and requires that gasoline cargo tanks loading will be vapor-tight. The loading rack is subject to these requirements.

Subpart DD, Off-Site Waste and Recovery Operations. This subpart has standards for control of air emissions from waste management or treatment facilities that store or process off-site material that contains listed HAP. The pipeline activities are not a waste management or treatment facility and, therefore, are not subject to this subpart.

Subpart UUU, Petroleum Refinery Catalytic Cracking, Catalytic Reforming, and Sulfur Plant Units (also known as MACT II) was promulgated on April 11, 2002. The pipeline activities do not operate any petroleum refinery catalytic cracking, catalytic reforming, and/or sulfur plant units and, therefore, are not subject to this subpart.

Subpart EEEE, Organic Liquids Distribution (also known as OLD MACT) was promulgated on February 3, 2004. This subpart affects storage tanks, transfer racks, equipment leak components, and transport vehicles in organic liquid service that are not part of an affected source under another NESHAP. The definition of organic liquid for applicability to this subpart excludes gasoline, kerosene, and distillate oils and fuel oils, and any liquid with a true vapor pressure less than 0.1 psia. Controls are not required for storage tanks with a capacity of less than 5,000 gallons. The pipeline activities are not subject to Subpart EEEE since they are subject to NESHAP Subpart CC and Subpart R.

Subpart FFFF, Miscellaneous Organic Chemical Manufacturing (also known as MON MACT). This subpart contains provisions for chemical manufacturing process units that meet the criteria specified. The pipeline activities are not subject to this regulation since they are subject to NESHAP Subpart CC and Subpart R.

Subpart BBBBBB, Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. This subpart was promulgated in the Federal Register on January 10, 2008. Affected sources are area sources that are: (1) bulk gasoline terminals that are not subject to the control requirements of 40 CFR Part 63 Subpart R, (2) pipeline breakout stations that are not subject to the control requirements of 40 CFR Part 63 Subpart R, (3) pipeline pumping stations, and (4) bulk gasoline plants. A bulk gasoline plant is any public or private gasoline storage and distribution facility with a throughput less than 20,000 gallons per day, while a bulk gasoline terminal is a facility with a throughput of 20,000 gallons per day or greater. Gasoline storage tanks, loading racks, and equipment components at bulk gasoline terminals, pipeline breakout stations, and pipeline pumping stations are subject to control standards or work practice standards, monitoring, and recordkeeping. The product loading terminal is considered part of the total refinery site which is

a major source of HAP and is subject to Subpart R; therefore, Subpart BBBBBB is not applicable to the PCPT.

Subpart CCCCCC: Gasoline Dispensing Facilities. This subpart establishes national emission limitations and management practices for HAPs emitted from the loading of gasoline storage tanks at gasoline dispensing facilities (GDF) located at an area source. While this facility contains a GDF, it is located at a major source for HAPs and therefore is not subject to this subpart.

CAM, 40 CFR Part 64

[Applicable]

Compliance Assurance Monitoring (CAM) as published in the Federal Register on October 22, 1997, applies to any pollutant specific emission unit at a major source that is required to obtain a Title V permit, if it meets all of the following criteria.

- It is subject to an emission limit or standard for an applicable regulated air pollutant
- It uses a control device to achieve compliance with the applicable emission limit or standard
- It has potential emissions, prior to the control device, of the applicable regulated air pollutant of 100 TPY

The only active control device at the pipeline activities is the vapor collection system for the loading rack. The rack is subject to NSPS Subpart XX and NESHAP Subpart R and is, therefore, exempt from CAM monitoring requirements per 40 CFR 64.2 (b)(i).

Chemical Accident Prevention Provisions, 40 CFR Part 68

[Applicable]

Toxic and flammable substances subject to this regulation are present in the facility in quantities greater than the threshold quantities. A revised Risk Management Plan for the refinery was submitted to EPA on January 22, 2001. Pipeline activities are not subject to a Risk Management Plan. More information on this federal program is available on the web page: [www.epa.gov/rmp](http://www.epa.gov/rmp).

Stratospheric Ozone Protection, 40 CFR Part 82

[Subparts A, B, and F are Applicable]

These standards require phase out of Class I & II substances, reductions of emissions of Class I & II substances to the lowest achievable level in all use sectors, and banning use of nonessential products containing ozone-depleting substances (Subparts A & C); control servicing of motor vehicle air conditioners (Subpart B); require Federal agencies to adopt procurement regulations which meet phase out requirements and which maximize the substitution of safe alternatives to Class I and Class II substances (Subpart D); require warning labels on products made with or containing Class I or II substances (Subpart E); maximize the use of recycling and recovery upon disposal (Subpart F); require producers to identify substitutes for ozone-depleting compounds under the Significant New Alternatives Program (Subpart G); and reduce the emissions of halons (Subpart H).

Subpart A identifies ozone-depleting substances and divides them into two classes. Class I controlled substances are divided into seven groups; the chemicals typically used by the manufacturing industry include carbon tetrachloride (Class I, Group IV) and methyl chloroform (Class I, Group V). A complete phase-out of production of Class I substances is required by January 1, 2000 (January 1, 2002, for methyl chloroform). Class II chemicals, which are hydrochlorofluorocarbons (HCFCs), are generally seen as interim substitutes for Class I CFCs. Class II substances consist of 33 HCFCs. A complete phase-out of Class II substances, scheduled in phases starting by 2002, is required by January 1, 2030.

Subpart F requires that any persons servicing, maintaining, or repairing appliances except for motor vehicle air conditioners; persons disposing of appliances, including motor vehicle air conditioners; refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment comply with the standards for recycling and emissions reduction.

The Pipeline and Terminal activities do not perform service on motor (fleet) vehicle air conditioning systems, industrial refrigeration equipment and building air conditioning systems which involve ozone-depleting substances.

## VIII. COMPLIANCE

### **Tier Classification**

This application has been determined to be a Tier II, based on the request for a permit renewal for an existing major source. The permittee has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant owns the land.

### **State Review**

This facility is located within 50 miles of the Oklahoma - Kansas border. The states of Kansas will be notified of the draft permit.

### **Public Review**

The applicant will publish a “Notice of Filing a Tier II Application” and also a “Notice of Tier II Draft Permit” in a local newspaper in Kay County where the facility is located. The notices will state that the application and the draft permit will be available for public review at the Ponca City Facility or the DEQ office in Oklahoma City. The notices will also state that the application and the draft permit will be available for public review at a local public library in Ponca City, Oklahoma. Information on all permit actions is available for review by the public in the Air Quality section of the DEQ Web page: [www.deq.ok.gov/](http://www.deq.ok.gov/).

### **EPA Review**

After the 30 day notice period, a proposed permit will be sent to EPA for a 45 day review, contingent on public comments received regarding the draft permit.

### **Inspection**

A full compliance evaluation of the Ponca City Pipeline Activities was conducted on February 2, 2018, by Holly Taber, Environmental Program Specialist for AQD. Spencer Cave, Environmental Specialist, Marty Dempsey, Facility Supervisor for the South Tank Farm and Cherokee Pump Station, and Vince Iraggi, Operator for the Products Terminal, represented the Facility. The facility was physically as described in the permit application. Details of the inspection have been documented in the Full Compliance Evaluation Memorandum No. 08179.

### **Fee Paid**

Part 70 source permit renewal application fee of \$7,500.

**IX. SUMMARY**

The facility was constructed and is operating as described in the permit application. Ambient air quality standards are not threatened at this site. There are no active Air Quality compliance or enforcement issues concerning this facility that would prohibit issuance of the permit. Issuance of the permit is recommended, contingent on public and EPA review.



**PERMIT TO OPERATE  
AIR POLLUTION CONTROL FACILITY  
SPECIFIC CONDITIONS**

**Phillips 66 Pipeline LLC  
Ponca City Pipeline Activities**

**Permit Number 2018-1651-TVR2**

The permittee is authorized to operate in conformity with the specifications submitted to the Air Quality Division (AQD) on December 6, 2018. The Evaluation Memorandum dated June 15, 2020, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operations under this permit constitutes acceptance of, and consent to, the conditions contained herein.

1. Points of emissions and emission limitations: [OAC 252:100-8-6(a)(1)]

**EUG TNK-1 40 CFR Part 63 Subpart CC storage vessels; some subject to 40 CFR Part 63 Subpart R; none subject to Subchapter 37**

EU ID	Point ID	Capacity (gallons)	Roof Type	Const / Mod Date	Throughput Limit (gal/yr)
T-609	T-609	2,957,682	EFR	1952	-
T-610	T-610	2,957,220	EFR	1951	-
T-613	T-613	2,944,830	EFR	1923	-
T-616	T-616	2,853,732	IFR	1924	-
T-617	T-617	2,956,380	EFR	1951	-
T-618	T-618	2,935,884	EFR	1923	-
T-620	T-620	2,957,640	EFR	1920	-
T-621	T-621	2,958,144	EFR	1923	-
T-625	T-625	2,964,696	EFR	1950	-
T-626	T-626	2,963,856	EFR	1923	-
T-627	T-627	2,956,968	EFR	1949	-
T-629	T-629	2,715,090	EFR	1969	-
T-630	T-630	2,715,090	EFR	1969	-
T-631	T-631	2,930,508	EFR	1923	-
PCPT T-5	PCPT T-5 <sup>(2)</sup>	18,312	FXR	1973	210,000 <sup>(1)</sup>
CP-1	CP-1 <sup>(2)</sup>	7,350	FXR	Pre 1974	168,000 <sup>(1)</sup>
CP-2	CP-2 <sup>(2)</sup>	7,350	FXR	Pre 1974	168,000 <sup>(1)</sup>

1. Based on a 12-month rolling total. Other tanks are grandfathered with no throughput or emission limits.
2. Tanks are subject to NESHAP Subpart R, Gasoline Distribution MACT, but not subject to any control standards.

a. The maximum true vapor pressure of liquids stored in the listed tanks shall be less than 11.1 psia. For crude oil or refined petroleum products, available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar month average temperature of the stored liquid may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517. [OAC 252:100-8-6(a)(1)]

- b. Tanks PCPT T-5, CP-1, and CP-2 are subject to 40 CFR Part 63 Subpart R (Gasoline Distribution MACT), but are exempt from the control standards for storage vessels in 40 CFR 63.423 since capacity is below the applicable threshold of 19,813 gallons. The tanks are also exempt from the recordkeeping requirements of 40 CFR 60.115b as they are not equipped with an internal or external floating roof. The tanks are subject only to the provisions of 40 CFR Part 63, Subpart A – General Provisions, as indicated in Table 1 of Subpart R.[40 CFR 63.420(h), 63.423(a), and 63.428(d)]
- c. The tanks are subject to 40 CFR Part 63 Subpart CC (Refinery MACT I), but are exempt from the control standards for storage vessels of 40 CFR 63.646 as long as a tank does not meet the definition of a Group 1 storage vessel. [40 CFR 63.641]
- i. Tanks PCPT T-5, CP-1, and CP-2 are Group 2 storage vessels since capacity is below the applicable threshold of 20,000 gallons. [40 CFR 63.641]
- ii. An owner or operator may use good engineering judgment or test results to determine the stored liquid weight percent total organic HAP for purposes of group determination. Data, assumptions, and procedures used in the determination shall be documented. When an owner or operator and AQD do not agree on whether the annual average weight percent organic HAP in the stored liquid is above or below 4 percent, an appropriate method as published by EPA or a consensus-based standards organization shall be used. [40 CFR 63.660(a)(1) and (2)]
- iii. If a tank is determined to be Group 2 because the weight percent total HAP content of the stored liquid is less than or equal to 4 percent, the permittee shall keep a record of any data, assumptions, and procedures used to make this determination. [40 CFR 63.655(i)(1)(iv)]
- iv. If a tank is determined to be Group 2 and the weight percent total HAP content of the stored liquid is greater than 4 percent, the permittee shall keep records demonstrating that the maximum true vapor pressure of the stored liquid is less than 0.75 psia. [OAC 252:100-43]
- v. The permittee shall keep records showing the dimensions of each tank and an analysis showing the capacity of each tank. [40 CFR 63.1065(a) per 40 CFR 63.655(i)(1)(vi)]
- vi. Specific Condition No. 1.e (for Group 1 storage vessels) shall apply if the HAP content for material stored in any of the listed tanks, other than tanks PCPT T-5, CP-1, and CP-2, is greater than an annual average of 4 wt% when storing a liquid with a maximum true vapor pressure of  $\geq 0.75$  psia. [40 CFR 63.641]
- vii. The permittee shall notify DEQ within 30 calendar days of changing the service of a Group 2 storage vessel to a Group 1 storage vessel such that it will be subject to the requirements of Specific Condition No. 1.e. [OAC 252:100-43]
- d. For each listed tank with a throughput limit, the permittee shall keep monthly records of the 12-month rolling total throughput when the tanks are in VOL service. [OAC 252:100-43]

- e. Any of the listed IFR or EFR tanks may store a liquid with a maximum true vapor pressure greater than or equal to 0.75 psia and with more than 4 wt% HAP. Tanks storing such a liquid are considered Group 1 storage vessels and are subject to the control standards of 40 CFR Part 63, Subpart CC. 40 CFR 63.660 specifies that Group 1 storage vessels subject to Subpart CC shall comply with the requirements of 40 CFR Part 63, Subpart WW or SS according to the requirements in 40 CFR 63.660(a) through (i). For any tank operating as a Group 1 storage vessel, the permittee shall comply with all applicable requirements of Subpart CC including, but not limited to, the following:[40 CFR Part 63 Subpart CC]
  
- i. The mechanical design and operating specifications for internal floating roof tanks of 40 CFR 63.1063(a)(1)(i), 63.1063(a)(2), 63.1063(b) and 63.660(b).
  
- ii. The mechanical design and operating specifications for external floating roof tanks of 40 CFR 63.1063(a)(1)(ii), 63.1063(a)(2), 63.1063(b) and 63.660(b).
- iii. The inspection and repair procedures for internal floating roof tanks of 40 CFR 63.1063(c)(1), 63.1063(d), 63.1063(e) and 63.660(e).
- iv. The inspection and repair procedures for external floating roof tanks of 40 CFR 63.1063(c)(2), 63.1063(d), 63.1063(e) and 63.660(e).
- v. The reporting requirements of 40 CFR 63.655(e) and 63.665(h)(2).
- vi. The recordkeeping requirements of 40 CFR 63.1065 and 63.655(i).

**EUG TNK-2: 40 CFR Part 63 Subpart CC storage vessels, subject to Subchapter 37**

EU ID	Point ID	Capacity (gallons)	Roof Type	Const/Mod Date	Throughput Limit (gal/yr) <sup>(1)</sup>
PCPT E-1	PCPT E-1	19,740	FXR	2008	9,200,000 <sup>(2)</sup>
PCPT E-2	PCPT E-2	19,740	FXR	2008	
PCPT E-3	PCPT E-3	19,740	FXR	2008	
PCPT E-4	PCPT E-4	19,740	FXR	2008	
PCPT E-5	PCPT E-5	19,740	FXR	2008	

<sup>(1)</sup> Based on a 12-month rolling total.

<sup>(2)</sup> Total for 5 tanks. Throughput may be divided among the tanks, as long as the total throughput is not exceeded.

- a. The maximum true vapor pressure of liquids stored in the listed tanks shall be less than 11.1 psia. For crude oil or refined petroleum products, available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar month average temperature of the stored liquid may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517. [OAC 252:100-8-6(a)(1)]

- b. The tanks are Group 2 storage vessels since capacity is below the applicable threshold of 20,000 gallons. [40 CFR 63.641]
- c. The permittee shall keep records showing the dimensions of each tank and an analysis showing the capacity of each tank. [40 CFR 63.123(a) per 40 CFR 63.654(i)(1)(vi)]
- d. The tanks shall be equipped with a permanent submerged fill pipe. [OAC 252:100-37-15(b)]

**EUG TNK-3: 40 CFR Part 60 Subpart Kb storage vessels**

EU ID	Point ID	Capacity (gallons)	Roof Type	Const/Mod Date
T-614	T-614	2,951,466	EFR	1923 / 2013
T-615	T-615	2,944,074	EFR	1923 / 2008

- a. The maximum true vapor pressure of liquids stored in the listed tanks shall be less than 11.1 psia. For crude oil or refined petroleum products, available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar month average temperature of the stored liquid may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517. [OAC 252:100-8-6(a)(1)]
- b. While these tanks are subject to 40 CFR 63 Subpart CC, they are only required to comply with 40 CFR 60, Subpart Kb, except as provided in paragraphs 40 CFR 63.640(n)(8)(i) through (vi) for Group 2 storage vessels or paragraphs 40 CFR 63.640(n)(8)(i) through (viii) for Group 1 storage vessels. [40 CFR 63.640 (n)(1) and (n)(2)]

**EUG FLR-1: Flares subject to 40 CFR Part 63 Subpart A, Subpart R, and Subpart CC**

This equipment has no specific emissions limitations, but is subject to standards (see Specific Condition No. 3).

EU ID	Point ID	Equipment	Const/ Mod Date
Flare-PT	Flare-PT	Truck Rack Flare	Pre 1973

**EUG LOD-1: Loading racks Subject to 40 CFR Part 63 Subpart CC and Subpart R and 40 CFR Part 60 Subpart XX**

This equipment is subject to standards (see Specific Condition No. 3).

EU ID	Point ID	Process	Const/ Mod Date	Throughput Limit (gal/yr) <sup>(1)</sup>
Load-PT	Load-PT	Loading Rack – Gasoline	1989	207,518,447
		Loading Rack - Diesel		142,881,553

1. Based on a 12-month rolling total.

**EUG CLN-1: Tank cleaning**

This is a Trivial Activity and no emission limits apply.

EU ID	Point ID	Equipment
PCSTF-TC	PCSTF-TC	Tank Cleaning Materials

**EUG FUG-1: Fugitive equipment leaks subject to 40 CFR Part 63 Subpart R**

This equipment has no specific emissions limitations, but is subject to standards (see Specific Condition No. 3).

EU ID	Point ID	Equipment	Number of Items <sup>(1)</sup>	Const/ Mod Date
Loading Rack Fugitive Leaks	Loading Rack Fugitive Leaks	Light Liquid Valves	573	Various
		Heavy Liquid Valves	88	Various
		Light Liquid Pump Seals	20	Various
		Heavy Liquid Pump Seals	0	Various
		Light Liquid Connectors	1951	Various
		Heavy Liquid Connectors	270	Various
		Light Liquid Other	203	Various
		Heavy Liquid Other	15	Various

1. Equipment counts are an estimate only and not a limitation.

**EUG FUG-2: Fugitive equipment leaks subject to 40 CFR 63 Part CC**

This equipment has no specific emissions limitations.

EU ID	Point ID	Equipment	Number of Items <sup>(1)</sup>	Const/ Mod Date
Pipeline Activities Piping Equipment Fugitive Leaks (non loading terminal)	Pipeline Activities Piping Equipment Fugitive Leaks (non loading terminal)	Vapor	0	Various
		Light Liquid Valves	573	Various
		Heavy Liquid Valves	0	Various
		Vapor	0	Various
		Light Liquid Pump Seals	44	Various
		Heavy Liquid Pump Seals	0	Various
		Vapor	4	Various
		Light Liquid Connectors	4370	Various
		Heavy Liquid Connectors	0	Various
		Vapor	1	Various
		Light Liquid Other	121	Various
		Heavy Liquid Other	0	Various

1. Equipment counts are an estimate only and not a limitation.

2. In addition to the requirements of 40 CFR Part 63 Subpart CC for storage tanks listed in Specific Condition No. 1, EUG FUG-2 and EUG LOD-1 are subject to 40 CFR Part 63 Subpart CC and shall comply with all applicable requirements including, but not limited to, the following: [40 CFR 63.640-655]
  - a. §63.641 Definitions.
  - b. §63.642 General standards.
  - c. §63.648 Equipment leak standards. The standards apply only to equipment that is “in organic HAP service”, i.e., contains or contacts a fluid (liquid or gas) that is at least 5 percent by weight of total organic HAP as determined according to the provisions of 40 CFR 63.180(d) of Subpart H and Table 1 of this subpart. The provisions of 63.180(d) of Subpart H also specify how to determine that a piece of equipment is not “in organic HAP service.”
  - d. §63.650 Gasoline loading rack provisions. The loading rack shall comply with 40 CFR Part 63 Subpart R, §§63.421, 63.422(a) through (c) and (e), 63.425(a) through (c), 63.425(e) through (i), 63.427(a) and (b), and 63.428(b), (c), (g)(1), and (h)(1) through (h)(3) and (k).
  - e. §63.655 Reporting and recordkeeping requirements.
    - i. For the loading rack, the permittee shall comply with the recordkeeping and reporting provisions in §63.428(b) and (c), (g)(1), and (h)(1) through (h)(3) of 40 CFR Part 63 Subpart R.
    - ii. For equipment leaks, the permittee shall comply with the recordkeeping and reporting provisions in paragraphs (d)(1) through (d)(6) of 40 CFR 63.655.
3. The loading rack (Load-PT), flare (Flare-PT), and equipment components of EUG FUG-1 are subject to both 40 CFR Part 60 Subpart XX and 40 CFR Part 63 Subpart R and shall comply only with the provisions in each subpart that contain the most stringent control requirements for the facility. The permittee shall comply with emission limits and applicable requirements including, but not limited to, the following: [40 CFR 63.420(g)]
  - a. The permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions as indicated by Table 1 of 40 CFR Part 63, Subpart R. [40 CFR 63.420(h)]
  - b. §63.422 Standards: Loading Racks.
    - i. The permittee shall comply with the requirements in 40 CFR 60.502 except for paragraphs (b), (c), and (j).
    - ii. Emissions to the atmosphere from the vapor collection and processing systems due to the loading of gasoline cargo tanks shall not exceed 10 milligrams of total organic compounds per liter of gasoline loaded.
    - iii. The permittee shall comply with 40 CFR 60.502(e) in accordance with the provisions of 40 CFR 63.422(c)
    - iv. As an alternative to 40 CFR 60.502(h) and (i), the permittee may comply with paragraphs (e)(1) and (e)(2) of 40 CFR 63.422.
  - c. §63.424 Standards: Equipment Leaks.
  - d. §63.425 Test Methods and Procedures.
    - i. The permittee shall maintain records of the performance test previously conducted on the vapor processing and collection system in accordance with 40 CFR 63.425(a),(b), and (c).
    - ii. The permittee shall comply with 40 CFR 63.425 (e) through (i). The permittee shall obtain documentation of an annual certification test using Method 27 for gasoline cargo

- tanks. As an alternative to the requirements of 40 CFR 63.425(e) the permittee may obtain documentation of compliance with 49 CFR 173.3(d), 179.7, 180.509, and 180.511 for the testing of railcar gasoline cargo tanks.
- e. §63.427 Continuous Monitoring.
    - i. The flare shall be equipped with a heat-sensing device installed in proximity to the pilot light to indicate the presence of a flame.
  - f. §63.428 Reporting and Recordkeeping.
    - i. The permittee shall keep records of the test results for each gasoline cargo tank loading at the facility per the provisions of 40 CFR 63.428(b).
    - ii. The permittee shall keep records of the flare design, and all visible emissions readings, heat content determinations, flow rate measurements, and exit velocity determinations made during the compliance determination required under 40 CFR 63.425(a).
  - g. On or after January 30, 2019, the flare (Flare-PT) shall comply with the requirements of 40 CFR 63.670, rather than the requirements of 40 CFR 63 Subpart R. [40 CFR 63.650(d)]
    - i. The permittee shall operate the flare with a pilot flare present at all times when regulated material is routed to the flare per the provisions of 40 CFR 63.670(b), and monitor for the presence of a pilot as specified in 40 CFR 63.670(g).
    - ii. The permittee shall operate the flare with no visible emissions per the provisions of 40 CFR 63.670(c), and monitor for visible emissions as specified in 40 CFR 63.670(h).
    - iii. The permittee shall operate the flare in compliance with the flare tip velocity requirements of 40 CFR 63.670(d), and follow the monitoring procedures specified in paragraphs (i) through (1) of 40 CFR 63.670.
    - iv. The permittee shall operate the flare within the combustion zone operating limits as specified in 40 CFR 63.670(e) per the provisions of 40 CFR 63.670(m).
    - v. The permittee shall operate the flare within the dilution operating limits for flares with perimeter assist air as specified in 40 CFR 63.670(f) per the provisions of 40 CFR 63.670(n).
    - vi. The permittee shall keep the records specified in §63.655(i)(9).
    - vii. The permittee shall comply with the reporting requirements specified in §63.655(g)(11).
    - viii. The permittee may request approval from the Administrator for site-specific operating limits per the provisions of 40 CFR 63.670(r).
4. Tanks T-614 and T-615 are subject to federal New Source Performance Standards, 40 CFR Part 60, Subpart Kb, and shall comply with all applicable requirements for external floating roof tanks which shall include, but are not limited to, the following requirements:  
[40 CFR Part 60, Subpart Kb]
- a. The external floating roof shall be floating on the liquid surface at all times except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
    - i. All floating roof landing events shall be recorded (date and duration)
    - ii. When a floating roof of a tank is landed, the residual liquid in the tank shall be removed as rapidly as possible using a sump pump or other suitable method.

- iii. VOC emissions from roof landing events associated with product change outs shall be calculated and included within permitted emission limits, and reported consistent with the permit requirements.
  - iv. VOC emissions from equipment malfunction shall be reported as excess emissions.
  - b. Each opening in the external floating roof except for rim space vents and automatic bleeder vents shall provide a projection below the liquid surface. Except for automatic bleeder vents, rim space vents, roof drains, and leg sleeves, each opening in the floating roof is to be maintained in a closed position (i.e., no visible gaps) except when in actual use.
  - c. Automatic bleeder vents are to be closed at all times when the roof is floating except when the roof is being floated off or landed on the roof leg supports.
  - d. Rim space vents are to be set to open only at the manufacturer's recommended setting or when the external floating roof is not floating.
  - e. Two seals shall be installed, a primary metallic shoe seal, or a liquid-mounted seal, and a secondary seal which completely covers the annular space between the floating roof and the tank wall.
  - f. The accumulated area of gaps between the tank wall and the metallic shoe seal or the liquid-mounted seal shall not exceed 10 square inches per foot of tank diameter nor shall any gap exceed 1.5 inches. One end of the metallic shoe is to extend into the stored liquid and the other end is to extend a minimum vertical distance of 24 inches above the stored liquid surface.
  - g. The accumulated area of gaps between the tank wall and secondary seal used in combination with a metallic shoe or liquid-mounted primary seal shall not exceed 1.0 square inch per foot of tank diameter nor shall any gap exceed 0.5 inches.
  - h. The permittee shall comply with the testing and procedures requirements of § 60.113b (b)
  - i. The permittee shall comply with the applicable reporting and recording requirements of §60.115 b.
  - j. The permittee shall comply with the applicable monitoring of operation requirements of §60.116 b.
  - k. The primary seals shall be checked every 5 years. The secondary seal on an external floating roof shall be checked at least yearly for gaps.
5. Tanks T-614 and T-615, if defined as 40 CFR 63 Subpart CC Group 2 tanks, shall comply with following exemptions to 40 CFR Subpart Kb, as applicable. [40 CFR 63.640(n)(1)]
- a. Storage vessels that are to comply with §60.112b(a)(2) of subpart Kb are exempt from the secondary seal requirements of §60.112b(a)(2)(i)(B) during the gap measurements for the primary seal requirements by §60.113b(b) of subpart Kb.
  - b. If the permittee determines that it is unsafe to perform the seal gap measurements required in §60.113b(b) of this chapter or to inspect the vessel to determine compliance with §60.113b(a) of this chapter because the roof appears to be structurally unsound and poses an imminent danger to inspecting personal, the permittee shall comply with the requirements in either §63.120(b)(7)(i) or (ii) of subpart G (only up to the compliance date specified in paragraph (h) of this section for compliance with §63.660, as applicable) or either §63.1063(c)(2)(iv)(A) or (B) of subpart WW.
  - c. If a failure is detected during the inspections required by §60.113b(a)(2) or during the seal gap measurements required by §60.113b(b)(1), and the vessel cannot be repaired within 45 days and the vessel cannot be emptied within 45 days, the permittee may utilize up to two extensions of up to 30 additional calendar days each. The permittee is not required to provide a request for the extension to the Administrator.



- d. If the extension is utilized in accordance with paragraph (n)(8)(iii) of this section, the permittee shall, in the next periodic report, identify the vessel, provide the information listed in §60.113b(a)(2) or §60.113b(b)(4)(iii), and describe the nature and date of the repair made or provide the date the storage vessel is emptied.
  - e. The permittee may submit the inspection reports required by §60.115b(a)(3), (a)(4) and (b)(4) of subpart Kb as part of the periodic reports required by this subpart, rather than within the 30-day period specified in §60.115b(a)(3), (a)(4), and (b)(4) of subpart Kb.
  - f. The reports of rim seal inspections specified in §60.115b(b)(2) are not required if none of the measured gaps or calculated gap areas exceed the limitations specified in §60.113b(b)(4). Documentation of the inspections shall be recorded as specified in §60.115b(b)(3).
6. Tanks T-614 and T-615, if defined as 40 CFR 63 Subpart CC Group 1 tanks, shall comply with following exemptions to 40 CFR Subpart Kb, as applicable. [40 CFR 63.640(n)(2)]
- a. Storage vessels that are to comply with §60.112b(a)(2) of subpart Kb are exempt from the secondary seal requirements of §60.112b(a)(2)(i)(B) during the gap measurements for the primary seal requirements by §60.113b(b) of subpart Kb.
  - b. If the permittee determines that it is unsafe to perform the seal gap measurements required in §60.113b(b) of this chapter or to inspect the vessel to determine compliance with §60.113b(a) of this chapter because the roof appears to be structurally unsound and poses an imminent danger to inspecting personnel, the permittee shall comply with the requirements in either §63.120(b)(7)(i) or (ii) of subpart G (only up to the compliance date specified in paragraph (h) of this section for compliance with §63.660, as applicable) or either §63.1063(c)(2)(iv)(A) or (B) of subpart WW.
  - c. If a failure is detected during the inspections required by §60.113b(a)(2) or during the seal gap measurements required by §60.113b(b)(1), and the vessel cannot be repaired within 45 days and the vessel cannot be emptied within 45 days, the permittee may utilize up to two extensions of up to 30 additional calendar days each. The permittee is not required to provide a request for the extension to the Administrator.
  - d. If the extension is utilized in accordance with paragraph (n)(8)(iii) of this section, the permittee shall, in the next periodic report, identify the vessel, provide the information listed in §60.113b(a)(2) or §60.113b(b)(4)(iii), and describe the nature and date of the repair made or provide the date the storage vessel is emptied.
  - e. The permittee may submit the inspection reports required by §60.115b(a)(3), (a)(4) and (b)(4) of subpart Kb as part of the periodic reports required by this subpart, rather than within the 30-day period specified in §60.115b(a)(3), (a)(4), and (b)(4) of subpart Kb.
  - f. The reports of rim seal inspections specified in §60.115b(b)(2) are not required if none of the measured gaps or calculated gap areas exceed the limitations specified in §60.113b(b)(4). Documentation of the inspections shall be recorded as specified in §60.115b(b)(3).
  - g. To be in compliance with §60.112b(a)(1)(iv) or (a)(2)(ii) of this chapter, guidepoles in floating roof storage vessels must be equipped with covers and/or controls (e.g., pole float system, pole sleeve system, internal sleeve system or flexible enclosure system) as appropriate to comply with the “no visible gap” requirements.
  - h. If a flare is used as a control device for a storage vessel, on or after January 30, 2019, the owner or operator must meet the requirements of §63.670 instead of the requirements referenced from part 60, subpart Kb of this chapter for the flare.
7. The permittee shall be authorized to operate the facility 24 hrs/day, every day of the year.

[OAC 252:100-8-6(a)]

8. The water draw equipment and drains on tanks storing crude oil at the Ponca City South Tank Farm, and any containers storing or transporting waste water drawn from those tanks, are subject to NESHAP, 40 CFR Part 61, Subpart FF and shall comply with all applicable requirements including, but not limited to, the following: [40 CFR Part 61 Subpart FF]
  - a. §61.342 Standards: General
  - b. §61.345 Standards: Containers. The facility may generate waste streams from crude oil storage tanks located at the South Tank Farm. This includes water and/or tank bottoms drawn from the tanks that may be stored on site in temporary containers and/or transported via tank trucks to the refinery for treatment. Containers storing or transporting this waste shall comply with the requirements of this subpart. Waste streams from tanks storing transmix or gas oil are not subject to these requirements
  - c. §61.346 Standards: Individual drain systems. Water draw equipment and drains on the crude oil tanks are subject to this subpart. This equipment is included in EUG FUG-2 in the Ponca City Refinery Part 70 permit (Permit No. 98-104-TV).
  - d. §61.354 Monitoring of operations.
  - e. §61.355 Test methods, procedures, and compliance provisions.
  - f. §61.356 Recordkeeping requirements.
  - g. §61.357 Reporting requirements.
9. Startup, Shutdown and Malfunction Plans (SSMP). Should any tank be changed to Group 1 service as defined in 40 CFR Part 63 Subpart CC, the permittee is required to develop an SSMP for tanks operated as a Group 1 storage vessel in accordance with 40 CFR Part 63 Subpart A. The plan is hereby incorporated into this permit by reference.

[40 CFR Part 63 Subparts A and CC]

  - a. The current SSMP shall be maintained for the life of the facility or until superseded by a new version. Superseded versions of the SSMP shall be retained for five years after the date of revision.
  - b. 40 CFR 63.10 requires immediate notifications to be made when action is taken by the owner or operator during an SSM event that is not consistent with the procedures specified in the SSMP and the source exceeds the relevant emission standard. However, 40 CFR Part 63 Subpart CC, Table 10 specifies that the owner or operator may instead report such actions in the next periodic report.
  - c. The permittee shall include records of actions taken during SSM events in the periodic reports required by 40 CFR 63.10.
  - d. The permittee shall maintain records of actions taken during all SSM events which demonstrate whether the SSMP was followed.
10. The following records shall be maintained on-site to verify Insignificant Activities. No recordkeeping is required for those operations that qualify as Trivial Activities.

[OAC 252:100-8-6 (a)(3)(B)]

  - a. For emissions from stationary reciprocating engines burning natural gas, gasoline, aircraft fuels, or diesel fuel, which are either used exclusively for emergency power generations or for peaking power service not exceeding 500 hours per year: records of annual hours of operation.

- b. For emissions from fuel storage/dispensing equipment operated solely for facility owned vehicles if fuel throughput is not more than 2,175 gallons/day, averaged over a 30-day period: records of fuel dispensed.
  - c. For emissions from storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature: records of tank capacity and stored liquid true vapor pressure.
  - d. For emissions from storage tanks constructed with a capacity less than 39,894 gallons which store VOC with a vapor pressure less than 1.5 psia at maximum storage temperature: records of tank capacity and stored liquid true vapor pressure.
  - e. For activities having the potential to emit no more than 5 TPY (actual) of any criteria pollutant: the type of activity and the amount of emissions from that activity (annual).
11. The following records shall be maintained on-site. These records shall be maintained for a period of at least five years following the date of recording. [OAC 252:100-43]
- a. For the listed tanks with throughput limits, monthly records of the 12-month rolling total throughput for months when the tanks are in VOL service.
  - b. For all the listed tanks, records of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the storage period.
  - c. For all the listed tanks, except tanks PCPT T-5, CP-1, and CP-2, the determination of HAP content of the liquids stored.
  - d. For the loading rack (Load-PT), monthly records of the 12-month rolling total throughput.
  - e. For equipment components not subject to the control requirements of 40 CFR 63.424, documentation demonstrating that the equipment is not “in organic HAP service.”
  - f. Records required by 40 CFR Part 63, Subpart CC and Subpart R.
  - g. Records required by 40 CFR Part 60, Subpart Kb and Subpart XX.
12. No later than 30 days after each anniversary date of the issuance of the initial Title V permit for this facility, the permittee shall submit to Air Quality Division of DEQ, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit. [OAC 252:100-8-6 (C)(5)(A), (C) & (D)]
13. This facility is considered an existing Prevention of Significant Deterioration (PSD) facility. As such, the facility is subject to the provisions of OAC 252:100-8-36.2(c) for any project as defined therein. [OAC 252:100-8-36.2(c)]
14. This permit supersedes Permit No. 2013-0453-TVR for the Ponca City Pipelines Activities, which is now closed and cancelled.

**MAJOR SOURCE AIR QUALITY PERMIT  
STANDARD CONDITIONS  
(June 21, 2016)**

**SECTION I. DUTY TO COMPLY**

A. This is a permit to operate / construct this specific facility in accordance with the federal Clean Air Act (42 U.S.C. 7401, et al.) and under the authority of the Oklahoma Clean Air Act and the rules promulgated there under. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

B. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ). The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

C. The permittee shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Oklahoma Clean Air Act and shall be grounds for enforcement action, permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application. All terms and conditions are enforceable by the DEQ, by the Environmental Protection Agency (EPA), and by citizens under section 304 of the Federal Clean Air Act (excluding state-only requirements). This permit is valid for operations only at the specific location listed.  
[40 C.F.R. §70.6(b), OAC 252:100-8-1.3 and OAC 252:100-8-6(a)(7)(A) and (b)(1)]

D. It shall not be a defense for a permittee 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 the permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations. [OAC 252:100-8-6(a)(7)(B)]

**SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS**

A. Any exceedance resulting from an emergency and/or posing an imminent and substantial danger to public health, safety, or the environment shall be reported in accordance with Section XIV (Emergencies). [OAC 252:100-8-6(a)(3)(C)(iii)(I) & (II)]

B. Deviations that result in emissions exceeding those allowed in this permit shall be reported consistent with the requirements of OAC 252:100-9, Excess Emission Reporting Requirements. [OAC 252:100-8-6(a)(3)(C)(iv)]

C. Every written report submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F. [OAC 252:100-8-6(a)(3)(C)(iv)]

**SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING**

A. The permittee shall keep records as specified in this permit. These records, including monitoring data and necessary support information, shall be retained on-site or at a nearby field office for a period of at least five years from the date of the monitoring sample, measurement, report, or application, and shall be made available for inspection by regulatory personnel upon request. Support information includes all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Where appropriate, the permit may specify that records may be maintained in computerized form.

[OAC 252:100-8-6 (a)(3)(B)(ii), OAC 252:100-8-6(c)(1), and OAC 252:100-8-6(c)(2)(B)]

B. Records of required monitoring shall include:

- (1) the date, place and time of sampling or measurement;
- (2) the date or dates analyses were performed;
- (3) the company or entity which performed the analyses;
- (4) the analytical techniques or methods used;
- (5) the results of such analyses; and
- (6) the operating conditions existing at the time of sampling or measurement.

[OAC 252:100-8-6(a)(3)(B)(i)]

C. No later than 30 days after each six (6) month period, after the date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to AQD a report of the results of any required monitoring. All instances of deviations from permit requirements since the previous report shall be clearly identified in the report. Submission of these periodic reports will satisfy any reporting requirement of Paragraph E below that is duplicative of the periodic reports, if so noted on the submitted report.

[OAC 252:100-8-6(a)(3)(C)(i) and (ii)]

D. If any testing shows emissions in excess of limitations specified in this permit, the owner or operator shall comply with the provisions of Section II (Reporting Of Deviations From Permit Terms) of these standard conditions.

[OAC 252:100-8-6(a)(3)(C)(iii)]

E. In addition to any monitoring, recordkeeping or reporting requirement specified in this permit, monitoring and reporting may be required under the provisions of OAC 252:100-43, Testing, Monitoring, and Recordkeeping, or as required by any provision of the Federal Clean Air Act or Oklahoma Clean Air Act.

[OAC 252:100-43]

F. Any Annual Certification of Compliance, Semi Annual Monitoring and Deviation Report, Excess Emission Report, and Annual Emission Inventory submitted in accordance with this permit shall be certified by a responsible official. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

[OAC 252:100-8-5(f), OAC 252:100-8-6(a)(3)(C)(iv), OAC 252:100-8-6(c)(1), OAC 252:100-9-7(e), and OAC 252:100-5-2.1(f)]

G. Any owner or operator subject to the provisions of New Source Performance Standards ("NSPS") under 40 CFR Part 60 or National Emission Standards for Hazardous Air Pollutants ("NESHAPs") under 40 CFR Parts 61 and 63 shall maintain a file of all measurements and other

information required by the applicable general provisions and subpart(s). These records shall be maintained in a permanent file suitable for inspection, shall be retained for a period of at least five years as required by Paragraph A of this Section, and shall include records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility, any malfunction of the air pollution control equipment; and any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 C.F.R. §§60.7 and 63.10, 40 CFR Parts 61, Subpart A, and OAC 252:100, Appendix Q]

H. The permittee of a facility that is operating subject to a schedule of compliance shall submit to the DEQ a progress report at least semi-annually. The progress reports shall contain dates for achieving the activities, milestones or compliance required in the schedule of compliance and the dates when such activities, milestones or compliance was achieved. The progress reports shall also contain an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted. [OAC 252:100-8-6(c)(4)]

I. All testing must be conducted under the direction of qualified personnel by methods approved by the Division Director. All tests shall be made and the results calculated in accordance with standard test procedures. The use of alternative test procedures must be approved by EPA. When a portable analyzer is used to measure emissions it shall be setup, calibrated, and operated in accordance with the manufacturer's instructions and in accordance with a protocol meeting the requirements of the "AQD Portable Analyzer Guidance" document or an equivalent method approved by Air Quality.

[OAC 252:100-8-6(a)(3)(A)(iv), and OAC 252:100-43]

J. The reporting of total particulate matter emissions as required in Part 7 of OAC 252:100-8 (Permits for Part 70 Sources), OAC 252:100-19 (Control of Emission of Particulate Matter), and OAC 252:100-5 (Emission Inventory), shall be conducted in accordance with applicable testing or calculation procedures, modified to include back-half condensables, for the concentration of particulate matter less than 10 microns in diameter (PM<sub>10</sub>). NSPS may allow reporting of only particulate matter emissions caught in the filter (obtained using Reference Method 5).

K. The permittee shall submit to the AQD a copy of all reports submitted to the EPA as required by 40 C.F.R. Part 60, 61, and 63, for all equipment constructed or operated under this permit subject to such standards. [OAC 252:100-8-6(c)(1) and OAC 252:100, Appendix Q]

#### **SECTION IV. COMPLIANCE CERTIFICATIONS**

A. No later than 30 days after each anniversary date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to the AQD, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit and of any other applicable requirements which have become effective since the issuance of this permit.

[OAC 252:100-8-6(c)(5)(A), and (D)]

B. The compliance certification shall describe the operating permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the methods used for determining compliance, currently and over the reporting period. The compliance certification shall also include such other facts as the permitting authority may require to determine the compliance status of the source.

[OAC 252:100-8-6(c)(5)(C)(i)-(v)]

C. The compliance certification shall contain a certification by a responsible official as to the results of the required monitoring. This certification shall be signed by a responsible official, and shall contain the following language: “I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.”

[OAC 252:100-8-5(f) and OAC 252:100-8-6(c)(1)]

D. Any facility reporting noncompliance shall submit a schedule of compliance for emissions units or stationary sources that are not in compliance with all applicable requirements. This schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the emissions unit or stationary source is in noncompliance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the emissions unit or stationary source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based, except that a compliance plan shall not be required for any noncompliance condition which is corrected within 24 hours of discovery.

[OAC 252:100-8-5(e)(8)(B) and OAC 252:100-8-6(c)(3)]

#### **SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM**

The permittee shall comply with any additional requirements that become effective during the permit term and that are applicable to the facility. Compliance with all new requirements shall be certified in the next annual certification.

[OAC 252:100-8-6(c)(6)]

#### **SECTION VI. PERMIT SHIELD**

A. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC 252:100-8) shall be deemed compliance with the applicable requirements identified and included in this permit.

[OAC 252:100-8-6(d)(1)]

B. Those requirements that are applicable are listed in the Standard Conditions and the Specific Conditions of this permit. Those requirements that the applicant requested be determined as not applicable are summarized in the Specific Conditions of this permit.

[OAC 252:100-8-6(d)(2)]

#### **SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT**

The permittee shall file with the AQD an annual emission inventory and shall pay annual fees based on emissions inventories. The methods used to calculate emissions for inventory purposes shall be based on the best available information accepted by AQD.

[OAC 252:100-5-2.1, OAC 252:100-5-2.2, and OAC 252:100-8-6(a)(8)]

**SECTION VIII. TERM OF PERMIT**

- A. Unless specified otherwise, the term of an operating permit shall be five years from the date of issuance. [OAC 252:100-8-6(a)(2)(A)]
- B. A source's right to operate shall terminate upon the expiration of its permit unless a timely and complete renewal application has been submitted at least 180 days before the date of expiration. [OAC 252:100-8-7.1(d)(1)]
- C. A duly issued construction permit or authorization to construct or modify will terminate and become null and void (unless extended as provided in OAC 252:100-8-1.4(b)) if the construction is not commenced within 18 months after the date the permit or authorization was issued, or if work is suspended for more than 18 months after it is commenced. [OAC 252:100-8-1.4(a)]
- D. The recipient of a construction permit shall apply for a permit to operate (or modified operating permit) within 180 days following the first day of operation. [OAC 252:100-8-4(b)(5)]

**SECTION IX. SEVERABILITY**

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [OAC 252:100-8-6 (a)(6)]

**SECTION X. PROPERTY RIGHTS**

- A. This permit does not convey any property rights of any sort, or any exclusive privilege. [OAC 252:100-8-6(a)(7)(D)]
- B. This permit shall not be considered in any manner affecting the title of the premises upon which the equipment is located and does not release the permittee from any liability for damage to persons or property caused by or resulting from the maintenance or operation of the equipment for which the permit is issued. [OAC 252:100-8-6(c)(6)]

**SECTION XI. DUTY TO PROVIDE INFORMATION**

- A. The permittee shall furnish to the DEQ, upon receipt of a written request and within sixty (60) days of the request unless the DEQ specifies another time period, any information that the DEQ may request to determine whether cause exists for modifying, reopening, revoking, reissuing, terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit. [OAC 252:100-8-6(a)(7)(E)]
- B. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 27A O.S. § 2-5-105(18). Confidential information shall be clearly labeled as such and shall be separable from the main body of the document such as in an attachment. [OAC 252:100-8-6(a)(7)(E)]



C. Notification to the AQD of the sale or transfer of ownership of this facility is required and shall be made in writing within thirty (30) days after such sale or transfer.

[Oklahoma Clean Air Act, 27A O.S. § 2-5-112(G)]

## **SECTION XII. REOPENING, MODIFICATION & REVOCATION**

A. The permit may be modified, revoked, reopened and reissued, or terminated for cause. Except as provided for minor permit modifications, the filing of a request by the permittee for a permit modification, revocation and reissuance, termination, notification of planned changes, or anticipated noncompliance does not stay any permit condition.

[OAC 252:100-8-6(a)(7)(C) and OAC 252:100-8-7.2(b)]

B. The DEQ will reopen and revise or revoke this permit prior to the expiration date in the following circumstances:

[OAC 252:100-8-7.3 and OAC 252:100-8-7.4(a)(2)]

- (1) Additional requirements under the Clean Air Act become applicable to a major source category three or more years prior to the expiration date of this permit. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit.
- (2) The DEQ or the EPA determines that this permit contains a material mistake or that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (3) The DEQ or the EPA determines that inaccurate information was used in establishing the emission standards, limitations, or other conditions of this permit. The DEQ may revoke and not reissue this permit if it determines that the permittee has submitted false or misleading information to the DEQ.
- (4) DEQ determines that the permit should be amended under the discretionary reopening provisions of OAC 252:100-8-7.3(b).

C. The permit may be reopened for cause by EPA, pursuant to the provisions of OAC 100-8-7.3(d).

[OAC 100-8-7.3(d)]

D. The permittee shall notify AQD before making changes other than those described in Section XVIII (Operational Flexibility), those qualifying for administrative permit amendments, or those defined as an Insignificant Activity (Section XVI) or Trivial Activity (Section XVII). The notification should include any changes which may alter the status of a “grandfathered source,” as defined under AQD rules. Such changes may require a permit modification.

[OAC 252:100-8-7.2(b) and OAC 252:100-5-1.1]

E. Activities that will result in air emissions that exceed the trivial/insignificant levels and that are not specifically approved by this permit are prohibited.

[OAC 252:100-8-6(c)(6)]

## **SECTION XIII. INSPECTION & ENTRY**

A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized regulatory officials to perform the following (subject to the permittee's right to seek confidential treatment pursuant to 27A O.S. Supp. 1998, § 2-5-105(18) for confidential information submitted to or obtained by the DEQ under this section):

- (1) enter upon the permittee's premises during reasonable/normal working hours where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (2) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (3) inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (4) as authorized by the Oklahoma Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit.

[OAC 252:100-8-6(c)(2)]

#### SECTION XIV. EMERGENCIES

A. Any exceedance resulting from an emergency shall be reported to AQD promptly but no later than 4:30 p.m. on the next working day after the permittee first becomes aware of the exceedance. This notice shall contain a description of the emergency, the probable cause of the exceedance, any steps taken to mitigate emissions, and corrective actions taken.

[OAC 252:100-8-6 (a)(3)(C)(iii)(I) and (IV)]

B. Any exceedance that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to AQD as soon as is practicable; but under no circumstance shall notification be more than 24 hours after the exceedance.

[OAC 252:100-8-6(a)(3)(C)(iii)(II)]

C. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

[OAC 252:100-8-2]

D. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that:

[OAC 252:100-8-6 (e)(2)]

- (1) an emergency occurred and the permittee can identify the cause or causes of the emergency;
- (2) the permitted facility was at the time being properly operated;
- (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.

E. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof.

[OAC 252:100-8-6(e)(3)]

F. Every written report or document submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F.

[OAC 252:100-8-6(a)(3)(C)(iv)]

**SECTION XV. RISK MANAGEMENT PLAN**

The permittee, if subject to the provision of Section 112(r) of the Clean Air Act, shall develop and register with the appropriate agency a risk management plan by June 20, 1999, or the applicable effective date. [OAC 252:100-8-6(a)(4)]

**SECTION XVI. INSIGNIFICANT ACTIVITIES**

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate individual emissions units that are either on the list in Appendix I to OAC Title 252, Chapter 100, or whose actual calendar year emissions do not exceed any of the limits below. Any activity to which a State or Federal applicable requirement applies is not insignificant even if it meets the criteria below or is included on the insignificant activities list.

- (1) 5 tons per year of any one criteria pollutant.
- (2) 2 tons per year for any one hazardous air pollutant (HAP) or 5 tons per year for an aggregate of two or more HAP's, or 20 percent of any threshold less than 10 tons per year for single HAP that the EPA may establish by rule.

[OAC 252:100-8-2 and OAC 252:100, Appendix I]

**SECTION XVII. TRIVIAL ACTIVITIES**

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate any individual or combination of air emissions units that are considered inconsequential and are on the list in Appendix J. Any activity to which a State or Federal applicable requirement applies is not trivial even if included on the trivial activities list.

[OAC 252:100-8-2 and OAC 252:100, Appendix J]

**SECTION XVIII. OPERATIONAL FLEXIBILITY**

A. A facility may implement any operating scenario allowed for in its Part 70 permit without the need for any permit revision or any notification to the DEQ (unless specified otherwise in the permit). When an operating scenario is changed, the permittee shall record in a log at the facility the scenario under which it is operating. [OAC 252:100-8-6(a)(10) and (f)(1)]

B. The permittee may make changes within the facility that:

- (1) result in no net emissions increases,
- (2) are not modifications under any provision of Title I of the federal Clean Air Act, and
- (3) do not cause any hourly or annual permitted emission rate of any existing emissions unit to be exceeded;

provided that the facility provides the EPA and the DEQ with written notification as required below in advance of the proposed changes, which shall be a minimum of seven (7) days, or twenty four (24) hours for emergencies as defined in OAC 252:100-8-6 (e). The permittee, the DEQ, and the EPA shall attach each such notice to their copy of the permit. For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or

condition that is no longer applicable as a result of the change. The permit shield provided by this permit does not apply to any change made pursuant to this paragraph. [OAC 252:100-8-6(f)(2)]

### SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS

A. The following applicable requirements and state-only requirements apply to the facility unless elsewhere covered by a more restrictive requirement:

- (1) Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter.  
[OAC 252:100-13]
- (2) No particulate emissions from any fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU.  
[OAC 252:100-19]
- (3) For all emissions units not subject to an opacity limit promulgated under 40 C.F.R., Part 60, NSPS, no discharge of greater than 20% opacity is allowed except for:  
[OAC 252:100-25]
  - (a) Short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity;
  - (b) Smoke resulting from fires covered by the exceptions outlined in OAC 252:100-13-7;
  - (c) An emission, where the presence of uncombined water is the only reason for failure to meet the requirements of OAC 252:100-25-3(a); or
  - (d) Smoke generated due to a malfunction in a facility, when the source of the fuel producing the smoke is not under the direct and immediate control of the facility and the immediate constriction of the fuel flow at the facility would produce a hazard to life and/or property.
- (4) No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards.  
[OAC 252:100-29]
- (5) No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide.  
[OAC 252:100-31]
- (6) Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system.  
[OAC 252:100-37-15(b)]
- (7) All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs.  
[OAC 252:100-37-36]

**SECTION XX. STRATOSPHERIC OZONE PROTECTION**

A. The permittee shall comply with the following standards for production and consumption of ozone-depleting substances: [40 CFR 82, Subpart A]

- (1) Persons producing, importing, or placing an order for production or importation of certain class I and class II substances, HCFC-22, or HCFC-141b shall be subject to the requirements of §82.4;
- (2) Producers, importers, exporters, purchasers, and persons who transform or destroy certain class I and class II substances, HCFC-22, or HCFC-141b are subject to the recordkeeping requirements at §82.13; and
- (3) Class I substances (listed at Appendix A to Subpart A) include certain CFCs, Halons, HBFCs, carbon tetrachloride, trichloroethane (methyl chloroform), and bromomethane (Methyl Bromide). Class II substances (listed at Appendix B to Subpart A) include HCFCs.

B. If the permittee performs a service on motor (fleet) vehicles when this service involves an ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all applicable requirements. Note: The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant. [40 CFR 82, Subpart B]

C. The permittee shall comply with the following standards for recycling and emissions reduction except as provided for MVACs in Subpart B: [40 CFR 82, Subpart F]

- (1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156;
- (2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158;
- (3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161;
- (4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166;
- (5) Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.158; and
- (6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

**SECTION XXI. TITLE V APPROVAL LANGUAGE**

A. DEQ wishes to reduce the time and work associated with permit review and, wherever it is not inconsistent with Federal requirements, to provide for incorporation of requirements established through construction permitting into the Source’s Title V permit without causing redundant review. Requirements from construction permits may be incorporated into the Title V permit through the administrative amendment process set forth in OAC 252:100-8-7.2(a) only if the following procedures are followed:

- (1) The construction permit goes out for a 30-day public notice and comment using the procedures set forth in 40 C.F.R. § 70.7(h)(1). This public notice shall include notice to the public that this permit is subject to EPA review, EPA objection, and petition to EPA, as provided by 40 C.F.R. § 70.8; that the requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process; that the public will not receive another opportunity to provide comments when the requirements are incorporated into the Title V permit; and that EPA review, EPA objection, and petitions to EPA will not be available to the public when requirements from the construction permit are incorporated into the Title V permit.
- (2) A copy of the construction permit application is sent to EPA, as provided by 40 CFR § 70.8(a)(1).
- (3) A copy of the draft construction permit is sent to any affected State, as provided by 40 C.F.R. § 70.8(b).
- (4) A copy of the proposed construction permit is sent to EPA for a 45-day review period as provided by 40 C.F.R. § 70.8(a) and (c).
- (5) The DEQ complies with 40 C.F.R. § 70.8(c) upon the written receipt within the 45-day comment period of any EPA objection to the construction permit. The DEQ shall not issue the permit until EPA's objections are resolved to the satisfaction of EPA.
- (6) The DEQ complies with 40 C.F.R. § 70.8(d).
- (7) A copy of the final construction permit is sent to EPA as provided by 40 CFR § 70.8(a).
- (8) The DEQ shall not issue the proposed construction permit until any affected State and EPA have had an opportunity to review the proposed permit, as provided by these permit conditions.
- (9) Any requirements of the construction permit may be reopened for cause after incorporation into the Title V permit by the administrative amendment process, by DEQ as provided in OAC 252:100-8-7.3(a), (b), and (c), and by EPA as provided in 40 C.F.R. § 70.7(f) and (g).
- (10) The DEQ shall not issue the administrative permit amendment if performance tests fail to demonstrate that the source is operating in substantial compliance with all permit requirements.

B. To the extent that these conditions are not followed, the Title V permit must go through the Title V review process.

## **SECTION XXII. CREDIBLE EVIDENCE**

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any provision of the Oklahoma implementation plan, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

[OAC 252:100-43-6]

Phillips 66 Pipeline LLC  
Mr. Ray Terrazas  
411 S. Keeler Ave  
Bartlesville, OK 74003

SUBJECT: Permit No. **2018-1651-TVR2**  
Ponca City Pipeline Activities  
Facility ID No.: 331  
Section 33 &34, Township 26N, Range 2E, Kay County, Oklahoma

Dear Mr. Terrazas:

Enclosed is the permit authorizing operation of the referenced facility. Please note that this permit is issued subject to standard and specific conditions, which are attached. These conditions must be carefully followed since they define the limits of the permit and will be confirmed by periodic inspections.

Also note that you are required to annually submit an emissions inventory for this facility. An emissions inventory must be completed on approved AQD forms and submitted (hardcopy or electronically) by April 1st of every year. Any questions concerning the form or submittal process should be referred to the Emissions Inventory Staff at (405) 702-4100.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me at (405) 702-4209.

Sincerely,

Amalia Talty, P.E.  
New Source Permits Section  
AIR QUALITY DIVISION



# PART 70 PERMIT

AIR QUALITY DIVISION  
STATE OF OKLAHOMA  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
707 N. ROBINSON, SUITE 4100  
P.O. BOX 1677  
OKLAHOMA CITY, OKLAHOMA 73101-1677

Permit No. 2018-1651-TVR2

Phillips 66 Pipeline LLC

having complied with the requirements of the law, is hereby granted permission to operate the Ponca City Pipeline Activities located in Section 33 & 34, T26N, R2E, Kay County, Oklahoma, subject to Major Source Standard Conditions dated July 21, 2009, and Specific Conditions, both attached.

This permit shall expire five (5) years from the issuance date below, except as authorized under Section VIII of the Standard Conditions.

\_\_\_\_\_  
Division Director  
Air Quality Division

\_\_\_\_\_  
Date