

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

MEMORANDUM

September 19, 2025

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

THROUGH: Rick Groshong, Compliance and Enforcement Group Manager

THROUGH: Eric L. Milligan, P.E., Engineering Manager, Engineering Section

THROUGH: Alex Johnson, E.I., New Source Permits Section

FROM: Elijah Ecklund, E.I., Engineering Section, ROAT

SUBJECT: Evaluation of Application No. 2018-0593-C (M-9)
Holly Energy Partners Tulsa, LLC
Tulsa Refinery Tank Farm and Product Loading (SIC 2911/NAICS 324110)
Facility ID No: 9701
Latitude: 36.12599°N, Longitude: 96.00158°W
Section 14, Township 19N, Range 12E, Tulsa County, Oklahoma
Physical Address: 1307 W. 35th St., Tulsa, OK 74107

SECTION I. INTRODUCTION

Holly Energy Partners Tulsa, LLC (HEP or the applicant) has submitted an application for a construction permit for their Tulsa Refinery Tank Farm and Product Loading facility. The facility is currently operating under Permit No. 2018-0593-TVR (M-5), issued on January 5, 2023. The permit will be processed under the enhanced procedures.

HEP submitted a renewal for their Title V operating permit application 2023-0666-TVR2 on August 7, 2023. In the renewal application, HEP requested to subject all fugitive equipment leaks to NSPS Subpart GGGa. The affected facility to which this subpart applies is facilities constructed, reconstructed, or modified after November 7, 2006. Since specific process units at the facility do not meet the applicability date criteria to be subject to Subpart GGGa, HEP has submitted the application for this construction permit to establish a specific condition to make the facility subject to Subpart GGGa.

Additionally, HEP submitted minor modifications under their Title V operating permit in applications 2018-0593-TVR (M-6) and 2018-0593-TVR (M-7) on December 13, 2023, and August 28, 2024, respectively. For a conservative approach, these modifications have been incorporated into this construction permit.

The total emissions from the facility are above the major source thresholds. This facility, therefore, is subject to Title V permitting requirements. The HEP facility is co-located with the HF Sinclair

Tulsa Refining LLC Tulsa Refinery East. For purposes of PSD, HEP, Tulsa Refinery East, and Tulsa Refinery West, are considered a single facility.

SECTION II. REQUESTED CHANGES

HEP is requesting the following changes to their Tulsa Refinery Tank Farm and Product Loading facility:

- 1) Replace Tank No. 14 (55,000-bbl Naphtha tank) with Tank No. 14A (55,950-bbl Naphtha tank)
- 2) Replace Tank No. 109 (37,500-bbl Black Oil tank) with Tank No. 109A (37,500-bbl Black Oil tank).
- 3) Replace Tank No. 117 (63,500-bbl Diesel tank) with Tank No. 117A, (66,950-bbl Diesel tank).
- 4) Replace Tank No. 131 (37,500-bbl Black Oil tank) with Tank No. 131A (37,000-bbl Black Oil tank).
- 5) Replace Tank No. 123 (37,500-bbl Vacuum Residual Oil tank) with Tank No. 123A (37,500-bbl Vacuum Residual Oil tank).
- 6) Replace Tank No. 125 (37,500-bbl Vacuum Residual Oil tank) with Tank No. 125A (37,500-bbl Vacuum Residual Oil tank).
- 7) Demolish Tanks No. 111, 442, 451, and 603.
- 8) Modify external floating roof Tanks No. 601 and 602 to have a domed roof installed so they can operate as internal floating roof tanks.
- 9) To overlap provisions of NESHAP Subpart CC so that all tanks subject to NESHAP Subpart CC can demonstrate compliance through NSPS Subpart Kb except as provided in §63.640(n)(8). To use the alternative means of compliance as provided in NSPS Subpart Kb §60.110(e)(5) so that all subject tanks may demonstrate compliance through 40 CFR Part 63 Subpart WW as a Specific Condition.
- 10) Establish a Specific Condition that all equipment leaks (each group of equipment within a process unit) are subject to the provisions of 40 CFR 60 Subpart GGa regardless of the date of construction, reconstruction, or modification. For the purposes of this permit, the tank farm and loading facility are considered process units.

Changes 1 through 4 were requested in 2018-0593-TVR (M-6), changes 5 through 6 were requested in 2018-0593-TVR (M-7), changes 7 through 9 were requested in 2023-0666-TVR2, and change 10 was requested in the application for this construction permit. All requested changes will be consolidated and integrated into the HEP Title V permit, via this construction permit.

The permit has been updated to the latest State of Oklahoma rules and federal regulations. Emissions factors and calculations have also been updated to reflect the most recent AP-42 and DEQ guidance. The table below lists the actual emissions from the previous permit which were based on the 2010 EI data and the previous version of AP-42 Section 7.1 compared to the revised actual emissions that are based on the 2023 EI and the revisions to AP-42 Section 7.1. Although the emissions from these tanks are represented as actual changes, there are no changes in permitted limits.

EUG-01 Revised Emissions

Tank No.	Description	Current Turnover	Current VOC (TPY)	Revised Turnovers	Revised VOC (TPY)	Change VOC (TPY)
1	Crude Oil Tank	5.86	1.01	0.64	4.39	3.38
2	Crude Oil Tank	8.77	1.10	3.19	6.34	5.24
3	Crude Oil Tank	1.78	1.12	29.40	3.71	2.59
8	Crude Oil Tank	10.65	1.22	1.11	2.27	1.05
460	Naphtha Tank	0.32	2.51	29.00	2.84	0.33
601	Gasoline Tank	49.99	7.49	197.01	0.87	(6.62)
602	Denatured Ethanol Tank	16.7	0.58	41.75	0.07	(0.51)
Totals		-	15.03	-	20.49	5.46

EUG-02 Revised Emissions

Tank No.	Description	Current Turnover	Current VOC (TPY)	Revised Turnovers	Revised VOC (TPY)	Change VOC (TPY)
9	Vacuum Residual Oil Tank	2.89	0.00	6.54	0.01	0.01
10A	Diesel Tank	3134	1.50	24.77	0.89	(0.61)
15	Vacuum Residual Oil Tank	15.0	0.00	20.24	0.11	0.11
16	Vacuum Residual Oil Tank	2.42	0.00	5.04	0.06	0.06
17	Diesel Tank	2.91	0.00	1.43	0.15	0.15
40	Vacuum Residual Oil Tank	15.3	0.00	26.50	0.01	0.01
41	Crude Oil Tank	2.99	0.00	0.00	0.00	0.00
102	Diesel Tank	1.56	0.17	1.92	0.14	(0.03)
103	Diesel Tank	5.87	0.25	1.36	0.15	(0.01)
104	Diesel Tank	16.5	0.45	11.85	0.34	(0.11)
108A	Vacuum Residual Oil Tank	0.79	0.00	1.10	0.02	0.02
109A	Vacuum Residual Oil Tank	3.10	0.00	0.96	0.00	0.00
110A	Diesel Tank	74.5	1.50	6.64	0.34	(1.16)

Tank No.	Description	Current Turnover	Current VOC (TPY)	Revised Turnovers	Revised VOC (TPY)	Change VOC (TPY)
115	Diesel Tank	27.4	2.57	32.49	3.46	0.89
215	Diesel Tank	No Data	No Data	0.00	0.00	0.00
117A	Diesel Tank	8.97	0.52	0.00	0.23	(0.29)
122	Vacuum Residual Oil Tank	6.14	0.00	8.66	0.03	0.03
123A	Vacuum Residual Oil Tank	4.51	0.00	24.24	1.42	1.42
125A	Vacuum Residual Oil Tank	7.25	0.00	5.52	0.30	0.3
131A	Black Oil Tank	28.9	0.00	29.81	0.95	0.95
452A	Diesel Tank	39.8	0.25	41.73	0.25	0.00
45A	Vacuum Residual Oil Tank	17.5	0.67	27.24	0.03	(0.64)
114	Diesel Tank	19.6	<0.01	58.11	0.29	0.29
107	Vacuum Residual Oil Tank	1.21	0.00	2.48	0.02	0.02
124	Vacuum Residual Oil Tank	4.54	0.00	23.85	2.50	2.5
34A	Vacuum Residual Oil Tank	5.04	0.01	10.95	0.00	(0.01)
36A	Vacuum Residual Oil Tank	31,307	1.77	70.34	0.76	(1.01)
Totals		-	9.66	-	12.46	2.89

EUG-03 Revised Emissions

Tank No.	Description	Current Turnover	Current VOC (TPY)	Revised Turnovers	Revised VOC (TPY)	Change VOC (TPY)
4	Gasoline Tank	2.89	3.28	1.79	2.49	(0.79)
6A	Gasoline Tank	24.4	2.88	5.13	4.36	1.48
7A	Gasoline Tank	18.6	3.94	51.37	4.44	0.5
14A	Crude Oil Tank	11.25	2.11	0.74	0.79	(1.32)
31	Crude Oil Tank	2.37	0.01	0.27	0.71	0.7
472	Gasoline Tank	30.1	5.23	26.60	8.89	3.66
605	Gasoline Tank	68.0	0.18	120.14	2.33	2.15
450A	Gasoline Tank	11.6	2.48	10.12	4.19	1.71
445	Gasoline Tank	8.66	0.02	11.16	3.96	3.94
464	Gasoline Tank	23.36	6.69	20.65	9.83	3.14
466A	Out of Service	62.5	9.70	0.00	0.00	(9.70)
467A	Gasoline Tank	23.7	8.90	23.09	10.61	1.71
470A	Gasoline Tank	53.6	7.75	50.03	10.31	2.56
473A	Gasoline Tank	48.6	8.26	46.20	10.20	1.94

Tank No.	Description	Current Turnover	Current VOC (TPY)	Revised Turnovers	Revised VOC (TPY)	Change VOC (TPY)
444A	Gasoline Tank	19.4	1.17	11.78	2.19	1.02
461A	Gasoline Tank	14.7	5.66	60.73	6.60	0.94
18A	Crude Oil Tank	5.94	0.03	8.35	2.38	2.35
12	Gasoline Tank	0.00	0.00	6.94	1.85	1.85
116A	Diesel Tank	4.71	0.01	3.64	0.02	0.01
465A	Gasoline Tank	0.32	3.03	22.77	7.18	4.15
471A	Gasoline Tank	1.37	4.54	25.94	8.62	4.08
11A	Diesel Tank	526	7.33	31.41	0.10	(7.23)
Totals		-	83.2	-	102.05	18.85

Since allowances to go to reporting periods commencing January 1 of each year have already been exercised, Specific Condition No. 3 (Permit No. 2018-0593-TVR (M-5)) will be removed.

The specific condition concerning record keeping for fugitive equipment has been expanded from the previous permit to list what is expected to be kept as records for the permittee.

The number ordering of the EUG has also been updated to be sequential from the previous permit. EUG 3, 3A, and 7 have been combined into EUG-02 due to being Group 2 storage vessels subject to NESHAP Subpart CC.

The emission factors used for loading operations and fugitives in EUG-05 and EUG-06, respectively, (Previously EUG 15 and EUG 16 in 2018-0593-TVR (M-5)) were found to be incorrect. The factors have been corrected and emissions updated. The change in emissions for these units is the result of these factors being corrected and results in a decrease in actual emissions.

In order to account for all applicable units subject to NESHAP Subpart CC, EUG 2 has been separated into EUG 2a, EUG 2b, and EUG 2c, where all EU will be subject to the requirements of NESHAP Subpart CC as outlined in Specific Condition No. 1 of this permit. EUG 2c will also be subject to NSPS Subpart UU.

EUG-05 has also been separated into EUG-05a and EUG-05b, where EUG-05a will be subject to the requirements of NESHAP Subpart CC.

SECTION III. PSD REVIEW

PSD review begins with requested changes in the Permit No. 2018-0593-TVR (M-6) (Project 1). Project 1 is the replacement of Tanks 14, 109, 117, and 131 with the newly constructed Tanks 14A, 109A, 117A, and 131A. Emissions of VOC are calculated using Tanks ESP. As these are like kind tank replacements, no associated emissions result from the changes.

Tank No.	Throughput (gal/yr)	Liquid in Tank	Height (ft)	Diameter (ft)	VOC (TPY)
14A ⁽¹⁾	1,471,680,000	Crude Oil	40	100	7.55

Tank No.	Throughput (gal/yr)	Liquid in Tank	Height (ft)	Diameter (ft)	VOC (TPY)
109A	735,840,000	Vacuum Residual Oil	30	96	4.04
117A	1,471,680,000	Diesel	48	100	3.87
131A	735,840,000	Black Oil	30	96	4.04

⁽¹⁾ Tank No. 14A is an IFR tank. Emissions include landing losses.

Tanks 109A and 131A were not in service during the review of this project and have zero TPY for the baseline actual emissions. The review for Project 1 is shown in the table below.

Tank No.	2018 VOC (TPY)	2019 VOC (TPY)	BAE	PTE	PEI
14A	1.98	0.02	1.00	7.55	6.55
109A	0.00	0.00	0.00	4.04	4.04
117A	0.52	1.33	0.93	3.87	2.94
131A	0.00	0.00	0.00	4.04	4.04
Totals					17.57

The Total PEI for Project 1 is less than 40 TPY, thus not warranting any further review.

The next project is the changes requested in Permit No. 2018-0593-TVR (M-7) (Project 2). Project 2 is the replacement of Tanks 123 and 125 with the newly constructed Tanks 123A and 125A. Emissions of VOC are calculated using Tanks ESP.

Tank No.	Throughput (gal/yr)	Liquid in Tank	Height (ft)	Diameter (ft)	VOC (TPY)
123A	367,920,000	Vacuum Residual Oil	30	96	2.70
125A	367,920,000	Vacuum Residual Oil	30	96	2.70

No data was provided for the baseline actual emissions, so a worst-case scenario of zero TPY was assumed. The review for Project 2 is shown in the table below:

Tank No.	BAE	PTE	PEI
123A	0.00	2.70	2.70
125A	0.00	2.70	2.70
Totals			5.40

The Total PEI for Project 2 is less than 40 TPY, thus not warranting any further review.

Other projects affiliated with this facility that occurred within three years of Project 1 and Project 2 were reviewed for project aggregation. The projects affiliated with this facility, Permit No. 2018-0593-TVR (M-6) and 2018-0593-TVR (M-7), along with the projects for the Tulsa Refinery East, Permits No. 2017-1908-C (M-11), 2023-0758-TVR4, 2017-1908-TVR3 (M-10), 2017-1908-TVR3 (M-9), 2017-1908-TVR3 (M-8), 2017-1908-TVR3 (M-7), and the Tulsa Refinery West, Permits No. 2018-0594-C (M-9), 2023-0757-TVR3, 2018-0594-TVR2 (M-8), 2018-0594-C (M-7), were found to not be applicable to this permit because they were separate projects.

SECTION IV. PROCESS DESCRIPTION

Overview

The facility consists of only the loading terminal and storage tanks. These are associated with the HF Sinclair Tulsa Refining LLC, Tulsa Refinery East. Refining is a complex process to make crude oil into a variety of products, including gasoline, heating oil, lubricants, and feedstocks for other industries. Refining equipment and processes involve a certain amount of iterative treatment, in which materials may be processed more than once at a particular location or may be returned to an earlier step in the system for further handling. A very general description of the entire process at this particular refinery starts with crude oil being processed in the Crude Unit. Process streams flow from the Crude Unit to the Fluid Catalytic Cracking Unit (FCCU), the Distillate Hydrotreating Unit (DHTU), Naphtha Hydrodesulfurization Unit (NHDS), and the Unifiner/Penex Unit (Penex). A residual stream becomes asphalt or residual fuel oil. Tulsa Refinery final products are classified as gasoline, distillate, residual fuel oil, asphalt, propane, butane, propylene, and sulfur.

Tankage

HEP is responsible for most tankage at the facility. The majority of the tanks are fixed roof tanks that store materials of low volatility. More volatile materials are stored in floating roof tanks, or pressure vessels, such as bullet tanks for propane and propene and sphere tanks for butane. The refinery operates the propane and butane pressurized vessels. HEP receives crude oil and ships out gasoline, diesel, and intermediate products by pipeline. HEP is also responsible for the asphalt loading racks. Asphalt and flux are loaded out by truck (EUG-04, Point ID 6170) and by railcar (EUG-04, Point ID 6169). There is also a diesel railcar loading rack (EUG-04, Point ID 14455) and a gas oil truck loading rack (EUG-04).

Sales Terminal

The sales terminal is responsible for the shipment of gasoline, diesel, and propane via tank trucks. The propane, gasoline, and diesel produced at the refinery are stored and eventually shipped out from this terminal. Gasoline and diesel are loaded from a four-bay, bottom-fill loading rack that is controlled by a Vapor Combustion Unit (EUG-05 Point ID 6275). An automatic interlock device shuts down the loading operation if the combustor malfunctions. All pumps at the terminal are powered by electricity and can pump a combined total of 7,200 gallons per minute under ideal conditions. Propane is loaded from a truck loading rack that is controlled by a vapor balance along with the propane tanks and flue gas system at the refiner.

Miscellaneous Points

Miscellaneous equipment leaks or fugitive emissions occur from all piping components located throughout the refinery. Fugitive emissions from the terminal are included with the refinery fugitive emissions (Point ID 6172, EUG-06).

SECTION V. PERMIT HISTORY

This table lists the permit history for the facility from issuance of the initial Title V permit.

Permits	Date Issued	Description
2012-924-C	1/9/2013	Initial Title V Construction Permit to replace an existing Vapor Combustion Unit.
2012-924-TV (M-1)	11/1/2013	Modification to replace Tanks 36, 464, 465, and 467. Incorporated into 2012-924-TV.
2012-924-TV	11/4/2013	Title V Operating Permit following construction authorization 2012-924-C.
2012-924-TV (M-2)	6/11/2014	Modification to add provisions to Specific Condition No. 3 regarding compliance reporting periods.
2012-924-C (M-3) PSD	4/20/2015	Modification to construct under PSD requirements for an upgrade and expansion project.
2012-924-TV (M-5)	2/2/2015	Administrative amendment to change operating parameters for the VCU and correctly list tank dimension parameters. Also, a modification to replace Tank 452, remove Tank 112, and subject all tanks in EUG-3 to NSPS Subpart UU.
2012-924-TV (M-5)	4/20/2015	Modification to replace Tank 18.
2012-924-TV (M-6)	6/22/2015	Modification to replace Tank 461 and an East Refinery tank.
2012-924-TV (M-7)	8/10/2015	Modification to replace Tank 108.
2012-924-TV (M-8)	11/10/2015	Modification to add newly constructed Tanks 45A and 500.
2012-924-TV (M-9)	7/8/2016	Administrative amendment to change the designation of Tank 500 to Tank 12. Also, a Modification to add the newly constructed Tanks 34A, 116A, 465A, and 471A, which replaced four other tanks at the facility.
2012-924-AD (M-10)	9/5/2017	Applicability Determination for establishing the “contemporaneous period” for PSD for this facility.
2012-924-AD (M-11)	10/16/2017	Applicability Determination for establishing if the expansion of a rail storage yard is “unrelated” to refinery expansion PSD permits.
2012-924-TV (M-12)	11/7/2018	Modification to replace Tank 11.
2018-0593-TVR	2/20/2019	Title V renewal, also an administrative amendment to update all EUG groupings for all tanks that have been removed, repaired, or replaced as listed in the previous modifications.
2018-0593-TVR (M-1)	5/3/2019	Modification to add a butane storage tank and unloading operations for the gasoline loading rack.
2018-0593-TVR (M-2)	9/9/2019	Modification to replace Tank 10.
2018-0593-TVR (M-3)	6/2/2020	Modification to replace Tank 110.
2018-0593-TVR (M-4)	3/29/2022	Modification to replace Tank 466.

Permits	Date Issued	Description
2018-0593-TVR (M-5)	1/5/2023	Modification to replace Tank 36 and to renew authorization to replace Tank 34. Authorization was initially given in 2012-924-TV (M-9), but demolition and construction was not done in that time.

SECTION VI. EQUIPMENT

Tank identifiers include a facility-wide “Tank No.” and a “Point ID” used in annual emission inventories. Only emission points are identified in the following description.

Per 2012-924-AD (M-11), the railcar storage yard is not among the emission units in the facility operating permit. Emissions from the railcar storage were found to be mobile activities and are negligible.

The emissions sources have been organized into Emissions Unit Groups (EUGs) identified below. The storage vessels have roof types that vary among Fixed Roof (FR), External Floating Roof (EFR), and Internal Floating Roof (IFR).

EUG-01 Group 1 Storage Vessels Subject to NESHAP CC – IFR

Tank No.	Point ID#	Roof Type	Description	Rating	Construction Date
1	6173	IFR	Crude Oil Tank	130,000-bbl	1949
2	6174	IFR	Crude Oil Tank	131,000-bbl	1949
3	6175	IFR	Crude Oil Tank	130,000-bbl	1949
8	6179	IFR	Crude Oil Tank	130,000-bbl	1949
460	6232	IFR	Naphtha Tank	80,000-bbl	1927
601	6276	IFR ⁽¹⁾	Gasoline Tank	18,500-bbl	1951
602	6277	IFR ⁽¹⁾	Denatured Ethanol Tank	9,700-bbl	1951

⁽¹⁾ Tanks No. 601 and 602 were previous external floating roofs but were converted in 2022 and 2010, respectively, to internal floating roof tanks per the requested change made in 2023-0666-TVR2. These changes did not meet the definition of modification in 40 CFR § 60.14.

EUG-02a Group 2 Storage Vessels Subject to NESHAP CC – FR

Tank No.	Point ID#	Roof Type	Description	Rating	Construction Date
9	6242	FR	Vacuum Residual Oil Tank	151,000-bbl	2005
10A	6180	FR	Diesel Tank	67,000-bbl	2019
15	6244	FR	Vacuum Residual Oil Tank	130,000-bbl	1949
16	6245	FR	Vacuum Residual Oil Tank	151,100-bbl	2003
17	6183	FR	Diesel Tank	37,500-bbl	1910
40	6185	FR	Vacuum Residual Oil Tank	6,100-bbl	1923
41	6248	FR	Crude Oil Tank	1,000-bbl	1973
102	6189	FR	Diesel Tank	37,500-bbl	1907
103	6190	FR	Diesel Tank	37,500-bbl	1907
104	6255	FR	Diesel Tank	37,500-bbl	2012

Tank No.	Point ID#	Roof Type	Description	Rating	Construction Date
108A	6191	FR	Vacuum Residual Oil Tank	37,500-bbl	2015
109A ⁽¹⁾	6192	FR	Vacuum Residual Oil Tank	37,500-bbl	2023
110A	6193	FR	Diesel Tank	67,000-bbl	2020
115	38828	FR	Diesel Tank	150,000-bbl	2007
215	38842	FR	Diesel Tank	150,000-bbl	2007
117A ⁽¹⁾	6200	FR	Diesel Tank	66,950-bbl	2022
122	6203	FR	Vacuum Residual Oil Tank	37,500-bbl	1907
123A ⁽²⁾	6260	FR	Vacuum Residual Oil Tank	37,500-bbl	2024
125A ⁽²⁾	6262	FR	Vacuum Residual Oil Tank	37,500-bbl	2024
131A ⁽¹⁾	6265	FR	Black Oil Tank	37,500-bbl	2023
452A	6230	FR	Diesel Tank	11,500-bbl	2015
45A	TK45A	FR	Vacuum Residual Oil Tank	6,000-bbl	2015

⁽¹⁾ Construction of Tanks No. 109, 117, and 131 replacements as requested in Permit No. 2018-0593-TVR (M-6).

⁽²⁾ Construction of Tanks No. 123 and 125 replacements as requested in Permit No. 2018-0593-TVR (M-7).

EUG-02b Group 2 Storage Vessels Subject to NESHAP CC – EFR

Tank No.	Point ID#	Roof Type	Description	Rating	Construction Date
114	6197	EFR	Diesel Tank	131,000-bbl	1949

EUG-02c Group 2 Storage Vessels Subject to NESHAP CC and NSPS UU – FR

Tank No.	Point ID#	Roof Type	Description	Rating	Construction Date
107	6257	FR	Vacuum Residual Oil Tank	55,000-bbl	2012
124	6261	FR	Vacuum Residual Oil Tank	37,500-bbl	2014
34A	6252	FR	Vacuum Residual Oil Tank	11,752-bbl	2016
36A	6253	FR	Vacuum Residual Oil Tank	11,752-bbl	2023

EUG-03 Storage Vessels Subject to NSPS Kb – IFR

Tank No.	Point ID#	Roof Type	Description	Rating	Construction Date
4	23129	IFR	Gasoline Tank	120,600-bbl	2003
6A	6177	IFR	Gasoline Tank	54,000-bbl	2013
7A	6178	IFR	Gasoline Tank	73,000-bbl	2014
14A ⁽¹⁾	6182	IFR	Crude Oil Tank	55,950-bbl	2023
31	6250	IFR	Crude Oil Tank	15,000-bbl	1998
472	6240	IFR	Gasoline Tank	140,000-bbl	2007
605	6278	IFR ⁽²⁾	Gasoline Tank	3,400-bbl	1987
450A	6228	IFR	Gasoline Tank	12,000-bbl	2012
445	6223	IFR	Gasoline Tank	30,000-bbl	2012
464	6234	IFR	Gasoline Tank	80,000-bbl	2013
466A	6236	IFR	Out of Service	80,000-bbl	2022
467A	6252	IFR	Gasoline Tank	80,000-bbl	2013

Tank No.	Point ID#	Roof Type	Description	Rating	Construction Date
470A	6238	IFR	Gasoline Tank	80,000-bbl	2013
473A	6241	IFR	Gasoline Tank	80,000-bbl	2013
444A	1	IFR	Gasoline Tank	32,147-bbl	2015
461A	6233	IFR	Gasoline Tank	73,183-bbl	2015
18A	6246	IFR	Crude Oil Tank	41,079-bbl	2015
12	TK12	IFR	Gasoline Tank	32,000-bbl	2015
116A	6199	IFR	Diesel Tank	50,000-bbl	2016
465A	6235	IFR	Gasoline Tank	80,000-bbl	2016
471A	6239	IFR	Gasoline Tank	150,000-bbl	2016
11A	6181	IFR	Diesel Tank	50,000-bbl	2018

(1) Construction of Tank No. 14 replacement as requested in Permit No. 2018-0593-TVR (M-6).

(2) Tank No. 605 was previously a fixed roof tank but was converted to an internal floating roof tank in 1987.

EUG-04 Low Vapor Pressure Loading Operations

This EUG handles materials that are not treated as VOC under OAC 252:100-37 and 39. This EUG was constructed in 1949, prior to any applicable rules, and is considered “grandfathered”. There are no emission limits or compliance obligations applied to this EUG under Title V but is limited to the currently existing equipment.

Rack	Point ID#	Description	Rating	Construction Date
Black Oil Railcar	6169	Asphalt, Flux, and Vacuum Tower Bottoms from East Refinery Rack	12 cars	1949
Black Oil Truck	6170	Asphalt, Flux, and Vacuum Tower Bottoms from East Refinery Rack	3 trucks	1949
Diesel Railcar	14488	Diesel from East Refinery Rack	8 cars	1949
Gas Oil Truck	6481	Gas Oils Truck Rack	2 trucks	1949

EUG-05a High Vapor Pressure Loading Operations Subject to NESHAP CC

Rack	Point ID#	Description	Rating	Construction Date
Terminal	6275	Gasoline, Ethanol, and Diesel Rack	4 trucks	1951

ID#	Point ID#	Description	Rating	Construction Date
VCU	6275	Vapor Combustion Unit	55-MMBTUH	2013

EUG-05b High Vapor Pressure Loading Operations

Rack	Point ID#	Description	Rating	Construction Date
Terminal	6275	Propane Rack	2 trucks	2015

EUG-06 Fugitive Emissions

Component	Estimated Counts
Gas/Vapor Valves	157
Light Liquid Valves	880
Heavy Liquid Valves	220
Light Liquid Valves	10
Pressure Relief Devices	37
Connectors	3,089
Sampling Connections	1
Compressor	1

EUG-07 Facility-Wide

This EUG is established to cover all rules or regulations that apply to the facility as a whole.

SECTION VI. EMISSIONS

Unless otherwise stated, emissions are based on the facility's 2023 Emissions Inventory.

EUG-01: Group 1 Storage Vessels

Emissions of VOC are calculated using AP-42 (6/20), Section 7.1. Working and breathing emissions are composed of rim seal, deck fitting, slotted and unslotted pole losses. Emission estimates do not include roof landing or tank cleaning emissions.

Tank No.	Turnovers	Liquid in Tank	Height (ft)	Diameter (ft)	VOC (TPY)
1	0.64	Crude Oil	48	140	4.39
2	3.19	Crude Oil	48	140	6.34
3	29.40	Crude Oil	48	140	3.71
8	1.11	Crude Oil	48	140	2.27
460	29.00	Naphtha	40	119	2.84
601	197.01	Gasoline	48	55	0.87
602	41.75	Denatured Ethanol	48	50	0.07
Totals					20.49

EUG-02: Group 2 Storage Vessels

Emissions of VOC are calculated using AP-42 (6/20), Section 7.1. Working and breathing emissions are composed of rim seal, deck fitting, and slotted and unslotted pole losses. Emission estimates do not include roof landing emissions for the EFR tank (114) or tank cleaning emissions. Emissions from Tank No. 109A, 117A, 123A, 125A, and 131A are based on their potential to emit in 8,760 hours per year of operation and are not based on the 2023 EI.

Tank No.	Turnovers	Liquid in Tank	Height (ft)	Diameter (ft)	VOC (TPY)
9	6.54	Vacuum Residual Oil	48	150	0.01
10A	24.77	Diesel	48	100	0.89
15	20.24	Vacuum Residual Oil	48	140	0.11

Tank No.	Turnovers	Liquid in Tank	Height (ft)	Diameter (ft)	VOC (TPY)
16	5.04	Vacuum Residual Oil	48	150	0.06
17	1.43	Diesel	30	96	0.15
40	26.50	Vacuum Residual Oil	40	32	0.01
41	0.00	Crude Oil	18	20	0.00
102	1.92	Diesel	30	96	0.14
103	1.36	Diesel	30	96	0.15
104	11.85	Diesel	30	96	0.34
108A	1.10	Vacuum Residual Oil	30	96	0.02
109A ⁽¹⁾	467.20	Vacuum Residual Oil	30	96	4.04
110A	6.64	Diesel	40	100	0.34
115	32.49	Diesel	48	150	3.46
215	0.00	Diesel	48	150	0.00
117A ⁽¹⁾	523.38	Diesel	48	100	3.87
122	8.66	Vacuum Residual Oil	30	96	0.03
123A ⁽¹⁾	233.60	Vacuum Residual Oil	30	96	2.70
125A ⁽¹⁾	233.60	Vacuum Residual Oil	30	96	2.70
131A ⁽¹⁾	467.20	Black Oil	30	96	4.04
452A	41.73	Diesel	32	53	0.25
45A	27.24	Vacuum Residual Oil	40	32	0.03
114	58.11	Diesel	48	140	0.29
107	2.48	Vacuum Residual Oil	40	100	0.02
124	23.85	Vacuum Residual Oil	30	96	2.50
34A	10.95	Vacuum Residual Oil	30	53	0.00
36A	70.34	Vacuum Residual Oil	30	53	0.76
Total					27.08

⁽¹⁾ VOC emissions from these tanks are based on their potential to emit, not the 2023 EI.

EUG-03: Storage Vessels

Emissions of VOC are calculated using AP-42 (6/20), Section 7.1. Working and breathing emissions are composed of rim seal, deck fitting, slotted and unslotted pole losses. Emission estimates do not include roof landing or tank cleaning emissions, except for Tank 14A. Emissions from Tank No. 14A are based on its potential to emit in 8,760 hours per year of operation and are not based on the 2023 EI.

Tank No.	Turnovers	Liquid in Tank	Height (ft)	Diameter (ft)	VOC (TPY)
4	1.79	Gasoline	48	134	2.49
6A	5.13	Gasoline	40	114	4.36
7A	51.37	Gasoline	40	114	4.44
14A ⁽¹⁾	626.27	Crude Oil	30	115	7.55
31	0.27	Crude Oil	48	48	0.71
472	26.60	Gasoline	48	150	8.89
605	120.14	Gasoline	32	30	2.33

Tank No.	Turnovers	Liquid in Tank	Height (ft)	Diameter (ft)	VOC (TPY)
450A	10.12	Gasoline	30	53	4.19
445	11.16	Gasoline	48	70	3.96
464	20.65	Gasoline	40	119	9.83
466A	0.00	Out of Service	40	119	0.00
467A	23.09	Gasoline	40	119	10.61
470A	50.03	Gasoline	40	119	10.31
473A	46.20	Gasoline	40	119	10.20
444A	11.78	Gasoline	48	70	2.19
461A	60.73	Gasoline	40	120	6.60
18A	8.35	Crude Oil	32	96	2.38
12	6.94	Gasoline	48	70	1.85
116A	3.64	Diesel	40	100	0.02
465A	22.77	Gasoline	40	120	7.18
471A	25.94	Gasoline	48	150	8.62
11A	31.41	Diesel	48	100	0.10
Totals					108.81

(1) VOC emissions from this tank are based on its potential to emit, not the 2023 EI.

EUG-04: Low Vapor Pressure Loading Operations

These racks handle materials with little or no volatile content. Emission estimates are calculated using mass balance for VOC (exclusive of HAPs), loading factors for HAPs from Section 5.2 of AP-42 (1/95) and actual 2022 amounts loaded. HAP emissions were not calculated for black oil and were less than 10 pounds per year at the diesel railcar rack.

Rack	Description	MM Gallons	VOC (TPY)
Black Oil Railcar	Asphalt, Flux, and Vacuum Tower Bottoms from East Refinery Rack	66.0	0.01
Black Oil Truck	Asphalt, Flux, and Vacuum Tower Bottoms from East Refinery Rack	62.8	0.34
Diesel Railcar	Diesel from East Refinery Rack	18.18	0.34
Gas Oil Truck	Gas Oils Truck Rack	4.92	0.04
Total			0.73

EUG-05: High Vapor Pressure Loading Operations

Emissions of VOC for the vapor combustor unit were calculated using AP-42 (7/2008), Section 5.2, Equation 1 using the following parameters in the table below:

Section 5.2, Equation Information for Transportation of Petroleum Liquids

Liquid	Annual Throughput (kgal)	Saturation Factor	Vapor Pressure (psia)	Molecular Weight	Temperature	Loading Loss lb/kgal	TOTAL TPY VOC
Diesel	229,950	1.0	0.0086	130	522	0.03	3.07
Gasoline	593,271	1.0	6.02	66	522	9.48	2,813.27
Ethanol	65,919	1.0	1.81	46.2	522	2.00	65.79
TOTALS	889,140						2,882.12

AP-42 (7/2008) Section 5.2 shows a 99.2% capture efficiency, with the balance of 0.8% of uncontrolled VOC being emitted as fugitive VOC emissions. Emissions were based on an assumed 99.5% control efficiency.

NO_x and CO emissions were based on manufacturer guarantees. SO₂, PM₁₀, and PM_{2.5} were calculated using factors from AP-42 (5/2025), Section 1.5 and a sulfur content of 1.0 gr/100 CF. This treats the vapors combusted as LPG.

The facility accepted the annual loading limits in the table above to maintain emission increases below PSD significance levels in the permit authorizing Vapor Combustor replacement, Permit No. 2012-924-C. Maximum heat release in the combustor is 55 MMBTUH, and maximum design flowrate to the combustor is 432,000 GPH. Dividing maximum throughput of 889,140,000 gallons per year by 432,000 GPH equals 2,058 hours per year equivalent. (Note: 1 gallon = 3.785 liters).

Loading Facility Vapor Combustor Emissions

Hourly Process Rate	Annual Process Rate	Pollutant	Emission Factor	Emissions	
				lb/hr	TPY
432,000 gal; 1,635,120 liters	889,140,000 gallons; 3,365,394,900 liters	NO _x	4 mg/l	14.41	14.83
		CO	10 mg/l	36.02	37.06
		VOC	0.03 lb/Mgal diesel 9.48 lb/Mgal gasoline 2.00 lb/Mgal ethanol	36.51 ⁽¹⁾	37.36 ⁽¹⁾
		PM ₁₀ / PM _{2.5}	0.7 lb/Mgal	0.46	0.33
		SO ₂	1.2 lb/Mgal	0.79	0.56

⁽¹⁾ 99.2% capture and 99.5% control applied to uncontrolled emissions of 2,882.12 TPY.

There are several loading racks that handle VOC materials. The terminal gasoline and diesel racks are vented to a vapor combustion device.

Propane rack loading is done under pressure with an airtight connection. Losses are negligible (less than 1 TPY).

Propane Loading Emissions

Parameter	Data
Liquids Loaded	Propane
Throughput, bbl/yr	151,021
Truck Capacity, bbl/truck	200
Annual Trucks, trucks/yr	755
MW, lb/lb-mol	44.01
Hose Length, ft	35
Hose Diameter, in	2
Line Temperature, °F	80
Number of Hoses	2
VOC Emitted, TPY	0.07

EUG-06: Fugitive Emissions

Equipment leaks from the terminal are included in this group. Emission factors are taken from the “Protocol for Equipment Leak Emission Estimates” (EPA-453/R-95-017), using light liquid/gas service data from Table 2-10, except for flanges/connectors, for which the factor is taken from Table 2-2 of the same reference. Screening factors for Table 2-10 calculations include 2,000 ppm for pump seals and 500 ppm for all others.

Component	Estimated Counts	Equipment Type	Factor lb/hr/source	VOC	
				lb/hr	TPY
Gas/Vapor Valves	157	Valves/all	0.000521	0.08	0.36
Light Liquid Valves	880	Valves/all	0.000521	0.46	2.01
Heavy Liquid Valves	220	Valves/all	0.000521	0.11	0.50
Light Liquid Pump Seals	10	Pump seals/all	0.011443	0.11	0.50
Pressure Relief Devices	37	Others ⁽¹⁾	0.001144	0.04	0.19
Relief Valves	27	Others ⁽¹⁾	0.001144	0.03	0.14
Compressor	1	Others ⁽¹⁾	0.001144	<0.01	0.01
Connectors	3,089	Connectors/all	0.000325	1.00	4.39
Sampling Connections	1	Connectors/all	0.000325	<0.01	<0.01
Flanges/ Connections	89	Connectors ⁽²⁾	0.000551	0.05	0.21
Totals ⁽³⁾				1.90	8.31

⁽¹⁾ “Other” equipment type is applied to any equipment other than connectors, flanges, open-ended lines, pumps, or valves.

⁽²⁾ Factor Taken from Table 2-2 of “Protocol for Equipment Leak Emission Estimates”.

⁽³⁾ Change in emissions is due to incorrect Factors usage in the previous Permit No. 2018-0593-TVR (M-5).

Facility-Wide Emissions

EUG ⁽¹⁾	Description	NOx		CO		VOC	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
EUG-01	Group 1 Storage Tanks	-	-	-	-	-	20.49
EUG-02	Group 2 Storage Tanks	-	-	-	-	-	27.08
EUG-03	Subpart Kb Storage Tanks	-	-	-	-	-	108.81
EUG-04	Low Vapor Pressure Loading	-	-	-	-	-	0.73
EUG-05	High Vapor Pressure Loading	14.41	14.83	36.02	37.06	36.51	37.36
EUG-06	Fugitives	-	-	-	-	1.90	8.31
Totals		14.41	14.83	36.02	37.06	38.41	202.78
Emissions from Permit No. 2018-0593-TVR (M-5) ⁽²⁾		14.41	14.83	36.02	37.06	65.68	274.50
Change in Emissions ⁽³⁾		0.00	0.00	0.00	0.00	(27.27)	(71.72)

⁽¹⁾ Hourly rates are based on the maximum hourly potential.

⁽²⁾ The VOC emissions for this permit account for a correction in the emissions from EUG 1 and EUG 3.

⁽³⁾ Emission factors have been corrected. These changes do not reflect a process change for the specific units which had their factors corrected.

EUG ⁽¹⁾	Description	PM		PM ₁₀		SO ₂	
		lb/hr	lb/hr	TPY	TPY	lb/hr	TPY
EUG-01	Group 1 Storage Tanks	-	-	-	-	-	-
EUG-02	Group 2 Storage Tanks	-	-	-	-	-	-
EUG-03	Subpart Kb Storage Tanks	-	-	-	-	-	-
EUG-04	Low Vapor Pressure Loading	-	-	-	-	-	-
EUG-05	High Vapor Pressure Loading	0.46	0.33	0.46	0.33	0.79	0.56
EUG-06	Fugitives	-	-	-	-	-	-
Totals		0.46	0.33	0.46	0.33	0.79	0.56
Emissions from Permit No. 2018-0593-TVR (M-5)		1.44	1.48	1.44	1.48	0.38	0.39
Change in Emissions ⁽²⁾		(0.98)	(1.15)	(0.98)	(1.15)	0.41	0.17

⁽¹⁾ Hourly rates are based on the maximum hourly potential.

⁽²⁾ Emission factors have been corrected. These changes do not reflect a process change for the specific units which had their factors corrected.

The emissions changes result from changes in the calculation methodology and revised throughputs of grandfathered tanks.

Greenhouse gas emissions are primarily CO₂ resulting from vapor combustion, with a maximum emission rate of 9,214 TPY.

HAP Emissions

The facility is part of a petroleum refinery, a major source of HAPs.

Pollutant	CAS #	2023 TPY
Benzene	71-43-2	1.20
Biphenyl	92-52-4	0.11
Carbon disulfide	75-15-0	0.00
Cumene	98-82-8	0.20
Ethylbenzene	100-41-4	1.00
n-Hexane	110-54-3	0.79
Lead & compounds	NA	0.00
Mercury & compounds	NA	0.00
Methanol	67-56-1	0.00
Naphthalene	91-20-3	1.32
Styrene	100-42-5	0.00
Toluene	108-88-3	1.84
Xylene	1330-20-7	1.22
Total HAP		7.68

With HAPs being below the major source threshold of 10 TPY individual HAP and 25 TPY of any combination of HAPs, the facility is not a major source of HAPs.

SECTION VII. INSIGNIFICANT ACTIVITIES

The insignificant activities identified and justified on Part 1b of the forms in the application and duplicated below. Appropriate record keeping of activities indicated below with “*” is required.

- (1) Activities with potential emissions of 5 TPY or less. None identified but may be used in the future.

SECTION VIII. 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 252:100-8 (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 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 applicable requirements for all sources are taken from the existing construction and operating permit, or are developed from the applicable requirement.

Section 8-4 requires a construction permit prior to the following:

- Construction of a new source that would require an operating permit under 40 CFR Part 70;
- Reconstruction of a major HAP source under 40 CFR Part 63;
- Any physical change or change in method of operation that would be significant modification under OAC 252:100-8-7.2(b)(2); or
- Any physical change or change in method of operation that would increase the PTE of any one regulated air pollutant by more than 10 TPY, calculated using the approach in 40 CFR § 40.153(b).

The requested modifications are not considered construction of a new major source or reconstruction of a new major source of HAP. The requested modifications are not physical changes or changes in method of operation that would increase the PTE of any one regulated air pollutant by more than 10 TPY. The modifications requested in permit applications 2018-0593-TVIR (M-6) and 2018-0593-TVIR (M-7), which are in addition to establishing NSPS Subpart GGGa as an applicable requirement, (i.e., replacement of six existing tanks) are physical changes or changes in method of operation that would not be considered significant modifications under OAC 252:100-8-7.2(b)(2) as indicated in Section XI.

This construction permit is being used to establish “applicable requirements” to avoid other applicable requirements (e.g., applicability of GGGa to avoid applicability of GGG). Applicable requirements are defined as “any term or condition of any preconstruction permits issued pursuant to regulations approved or promulgated through rulemaking under Title I, including parts C or D, of the Act”.

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) [Applicable]
Section 19-4 regulates emissions of PM from new and existing fuel-burning equipment, with emission limits based on maximum design heat input rating. Fuel-burning equipment is defined in OAC 252:100-19 as any internal combustion engine or gas turbine, or other combustion device used to convert the combustion of fuel into usable energy. The VCU at the terminal does not meet this definition and is therefore not affected by this rule.

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 VCU is a potential source of visible emissions at this facility. Proper operation of the VCU should maintain compliance.

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 originated 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 to 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 has negligible potential to violate this requirement; therefore it is not necessary to require specific precautions to be taken.

OAC 252:100-31 (Sulfur Compounds)

[Applicable]

Part 2 limits the ambient air concentration of hydrogen sulfide (H₂S) emissions from any facility to 0.2 ppmv (24-hour average) at standard conditions which is equivalent to 283 ug/m³. Based on modeling conducted for permit No. 2017-1908-TVR3, the ambient impacts of H₂S will be in compliance with the air concentration limit.

Part 5 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. For fuel gas having a gross calorific value of 1,000 Btu/SCF, this limit corresponds to fuel sulfur content of 1,203 ppmv. Since the VCU is not defined as fuel-burning equipment, it is not subject to Part 5 of this subchapter.

OAC 252:100-33 (Nitrogen Oxides)

[Not Applicable]

This subchapter limits NO_x emissions from new fuel-burning equipment with rated heat input greater than or equal to 50 MMBTUH to emissions of 0.2 lb of NO_x per MMBTU. Since the VCU is not defined as fuel-burning equipment, there are no equipment items that exceed the 50 MMBTUH threshold.

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)

[Applicable]

Part 3, Section 37-15 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 NSPS, Subparts K, Ka, or Kb are exempt from these requirements.

All tanks in EUG-01 have capacities greater than 40,000 gallons and are IFR storage tanks and, because they comply with NESHAP Subpart CC, they are in compliance with the following applicable requirements:

- The cover shall rest on the surface of the liquid contents at all times (i. e., off the leg supports), except during initial fill, when the storage vessel is completely emptied, or during refilling.
- When the cover is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
- The floating roof shall be equipped with a closure seal, or seals, to close the space between the cover edge and vessel wall.
- Floating roofs are not appropriate control devices if the VOCs have a vapor pressure of 11.1 psia (76.6 kPa) or greater under actual conditions.
- All gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

Most tanks in EUG-02 have capacities greater than 40,000 gallons, but none of them store liquids with vapor pressure greater than 1.5 psia. All of these tanks are exempt from these provisions per §37-4(a).

All tanks in EUG-03 have capacities greater than 40,000 gallons, are IFR storage tanks, and are subject to Subpart Kb. These tanks are exempt from these provisions per §37-15(c).

All tanks with a capacity of 400 gallons or more are filled through a permanent submerged pipe and are in compliance.

Part 3, Section 37-16 requires loading facilities with a throughput greater than 40,000 gallons per day to be equipped with a vapor-collection and disposal system unless all tank trucks or trailers are bottom loaded with hatches closed.

Loading in EUG-04, including black oil railcar loading, black oil truck loading, diesel railcar loading, and gas oil truck loading, involve material with vapor pressure below 1.5 psia, exempting it from these provisions per §37-4(a).

Loading in EUG-05, including gasoline, diesel, and propane truck loading, is bottom-loading with hatches closed and all connectors shut automatically or drained before disconnection with a potential to load more than 40,000 gallons a day. However, the gasoline rack is subject to NESHAP Subpart CC, which requires compliance with the standards of NESHAP Subpart R, making it exempt from these provisions. The propane loading rack is subject to this subchapter.

Part 5 limits the VOC content of coating of parts and products. Any painting operation will involve maintenance coatings of buildings and equipment and emit less than 100 pounds per day of VOCs and so is exempt.

Part 7 requires fuel-burning and refuse-burning equipment to be cleaned, operated, and maintained to minimize emissions of VOC. Such operation shall assure, based on manufacturer's data and good engineering practice, that the equipment is not overloaded and that temperature and available air are sufficient to provide essentially complete combustion. The VCU is considered refuse-burning equipment and, as such, is subject to this requirement.

Part 7 requires all effluent water separator openings that receive water containing more than 200 gallons per day of any VOC, to be sealed or the separator to be equipped with an external floating roof or a fixed roof with an internal floating roof or a vapor recovery system. All wastewater processing remained with HF Sinclair Tulsa Refining LLC.

OAC 252:100-39 (VOC in Non-attainment Areas)

[Applicable]

Part 3, Section 39-15 applies to petroleum refiner equipment leaks, known as Leak Detection and Reporting (LDAR). All components that might have leaks of VOC when tested by EPA Reference Method 21 of 40 CFR Part 60 are subject. Per §39-15(b)(2), VOC with a vapor pressure less than 0.0435 psia are exempt from this section. Standards and operating procedures are summarized below.

- 1) A monitoring program must be developed which is consistent with the provisions in 252:100-39-15(d) and (f). All leaking components must be recorded and an identifying tag placed on each component consistent with the provisions in 252:100-36-15(f)(3). Repairs and retesting of the leaking components should be done as soon as possible, but no later than 15 days after the leak is found. All leaking components which cannot be repaired until the unit is shutdown for a turnaround must be identified. Assure that all lines or pipes terminating with a valve are sealed with a second valve, a blind flange, a plug, or a cap.
- 2) The Division Director may require appropriate remedial action based on the number and severity of tagged leaks awaiting repair.
- 3) Pipeline valves and pressure relief valves in gas service shall be marked in some manner that is readily obvious to both monitoring and DEQ personnel.
- 4) Testing and calibration procedures to determine compliance must be consistent with EPA Test Method 21 of 40 CFR Part 60.

Monitoring requirements are summarized below.

- 1) Monitor yearly by the methods referenced in OAC 252:100-39-15(e) all pump seals, pipeline valves in liquid service, and process drains;
- 2) Monitor quarterly by the methods referenced in OAC 252:100-39-15(e) all compressor seals, pipeline valves in gas service, and pressure relief valves in gas service;
- 3) Monitor weekly by visual methods all pump seals;
- 4) Monitor within 24 hours any pump seal from which VOC liquids are observed to be dripping;
- 5) Monitor any relief valve within 24 hours after it has vented to the atmosphere; and
- 6) Monitor immediately after repair any component that was found leaking.
- 7) Pressure relief devices that are connected to an operating flare header, vapor recovery devices, inaccessible valves, storage tank valves, and valves that are not externally regulated are exempt from the above monitoring requirements, provided such inaccessible valves will be monitored during annual shutdown.

- 8) Upon detection of a leaking component that is not repaired on discovery, a weatherproof and readily visible tag with an identification number and date the leak is located, shall be affixed to the leaking component. The tag shall remain in place until the leaking component is repaired.

Recordkeeping and reporting requirements are applicable and incorporated in Specific Condition 2(i)(v) of this permit. The facility states that it is in compliance with all of the requirements listed above.

Part 3, Section 39-16 applies to petroleum refinery process unit turnarounds and outlines the required procedures to be used for shutdown, purging, and blowdown operations. The HEP operation does not operate process units.

Part 3, Section 39-17 applies to petroleum refinery vacuum producing systems and the requirements for noncondensable VOCs emitted. This section is not applicable to the tank farm and product loading operations.

Part 3, Section 39-18 applies to petroleum refinery effluent water separators and their requirements. This section is not applicable to the tank farm and product loading operations.

Part 5, Section 39-30 applies to petroleum liquid storage in vessels with external floating roofs with capacities greater than 40,000 gallons located in Tulsa County. Tank No. 114 is the only tank at the facility equipped with an EFR. Per OAC 252:100-39-30(b)(3) and (4), storage vessels subject to the equipment standards for external floating roofs in 40 CFR Part 60 Subparts Ka or Kb and 40 CFR Part 63 Subparts CC or G are exempt from this section's requirements. Tank No. 114 is subject to 40 CFR Part 63 Subpart CC and thus exempt from this section.

Part 7, Section 39-41(a) requires storage tanks with a capacity of 40,000 gallons or more that stores gasoline or any other VOC 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. Per OAC 252:100-39-4, VOCs with vapor pressure less than 1.5 psia under actual storage conditions are exemption from this section. EUG-01 and EUG-03 contain tanks with capacities greater than 40,000 gallons and are IFR storage tanks; thus, they are required to comply with the requirements of this section which include the requirements from OAC 252:100-37-15 and the following additional requirements:

- The seal closure devices for fixed roof vessels with an internal-floating cover shall meet the requirements of 252:100-39-30(c)(1)(B)(i) and (ii).
 - (i) There are no visible holes, tears, or other openings in the seal(s) or seal fabric.
 - (ii) The seal(s) are intact and uniformly in place around the circumference of the floating roof between the floating roof and the vessel wall.

However, it has been determined that the requirements of 40 CFR Part 60 Subpart Kb and 40 CFR Part 63 Subpart CC are equivalent or of equal efficiency.

EUG-02 contains tanks with capacities greater than 40,000 gallons, but do not store liquids with vapor pressure greater than 1.5 psia, making them exempt from these provisions.

Part 7, Section 39-41(b) requires storage tanks with capacities in-between 400 and 40,000 gallons that store gasoline or any VOC to be equipped with a submerged fill pipe or be bottom filled. All tanks with a capacity of 400 gallons or more are filled through a permanent submerged pipe and are in compliance. Section 41(b) also requires storage vessels that store gasoline or other VOCs with an average daily throughput equal to or greater than 30,000 gallons to collect the displaced vapors. There are no tanks between 400 and 40,000 gallons with a throughput equal to or greater than 30,000 gallons per day.

Part 7, Section 39-41(c) requires each VOC loading facility with an annual throughput of 120,000 gallons or greater or storage capacity greater than 10,000 gallons to be equipped with a vapor-collection and/or disposal system and meet the following requirements.

- While the VOCs are loaded through the hatches of a transport vessel, a pneumatic, hydraulic, or mechanical means shall be provided to ensure a vapor-tight seal at the hatch.
- A means shall be provided to prevent VOC drainage from the loading device when it is removed from the transport vessel, or to accomplish complete drainage before removal.
- When loading is by means other than hatches, all loading and vapor lines shall be equipped with fittings that make vapor-tight connections and which close automatically when disconnected.

The vapor collection and/or disposal portion of the system shall consist of one or more of the elements listed below from OAC 252:100-39-41(c)(5)(A) through (C), in addition to bottom loading or submerged fill of transport vessels.

- An absorption/adsorption system or condensation system that has a minimum recovery efficiency of 90 percent by weight of all the VOC vapors and gases entering such disposal system.
- A vapor handling system which directs all vapors to a fuel gas incineration system with a minimum disposal efficiency of 95 percent.
- Other equipment that has at least a 90 percent efficiency, provided plans for such equipment are approved by the Division Director.

The gasoline loading rack is subject to NESHAP Subpart CC, which requires compliance with NESHAP Subpart R. Because the standards and requirements of Subparts R and CC are equivalent to the required efficiencies of Section 39-41(c), compliance with them demonstrates compliance with this section. The propane loading rack is also subject to this subsection. However, the tank trucks are not vented to the atmosphere during loading. The tank trucks are pressurized and are capable of maintaining working pressures that prevent the loss of VOC to the atmosphere.

Part 7, Section 39-41(d) requires transport and delivery vessels to be designated and operated to be vapor tight, except when sampling, gauging or inspecting. The delivery vessel must be equipped

and operated to deliver VOC vapors to a vapor recovery/disposal system. Testing of the tank trucks for vapor tightness must follow the standards set forth in Appendix B of *Control of VOC Leaks from Gasoline Tank Trucks and Vapor Collection Systems*, EPA 450/2-78-051 or an equivalent method as determined by the Division Director. The requirements set forth in NESHAP Subparts R and CC are equivalent to the requirements in this section. The propane tanks are also subject to standards to ensure that they are capable of maintaining working pressures that prevent the loss of VOC to the atmosphere.

Part 7, Section 39-41(e) is only applicable to facilities located in the Tulsa County and requires that any gasoline or other VOC storage vessels greater than 2,000 gallons and less than 40,000 gallons or each storage vessel at a facility that dispenses more than 120,000 gallons a year of gasoline or other VOCs, to be equipped with a vapor control system. There are no tanks at this facility between 2,000 and 40,000 gallons.

Additionally, stationary loading facilities shall be checked annually in accordance with EPA Test Method 21. Leaks that were measured to be greater than 5,000 ppmv shall be repaired within 15 days. The facility shall retain inspection and repair records for at least two years.

Also, for transport/delivery vessels, facilities located in Tulsa county have to meet the following requirements.

Maintenance requirements:

- The delivery vessel must be maintained so that it is vapor tight except when sampling, gauging, or inspecting. These activities shall not occur while the vehicle is loading or unloading or is in a pressurized state.
- The delivery vessel must be equipped, maintained, and operated to receive vapors from sources identified in 252:100-39-41(b)(1) and 252:100-39-41(b)(2) and retain these and all other vapors until they are delivered into an authorized vapor recovery/disposal system.
- Vessels with defective equipment such as boots, seals, and hoses, or with other deficiencies that would impair the vessels' ability to retain vapors or liquid shall be repaired within 5 days.
- The certified testing facility must certify to the approving agency that the proper testing and repairs have occurred in accordance with 252:100- 39-41(e)(4)(B)(ii).
- No owner or operator shall allow a delivery vessel to be filled at a facility unable to receive displaced VOCs nor service vessels unable to deliver displaced vapors except for vessels/facilities exempted in 252:100-39-41(b). Terminal owners shall not fill vessels that do not have a current certified pressure test on file.

Inspection and testing requirements:

- Delivery vessels may be inspected by representatives of the DEQ in order to determine their state of repair. The owner or operator shall make any necessary repairs within 5 days. Upon certification of repairs, the vessel will be allowed to resume normal operation.

- Delivery vessels, delivering or receiving gasoline must be tested one time per year for vapor tightness. The vapor tightness test must be consistent with EPA Test Method 27. There shall be no avoidable visible liquid leaks.

This facility and the transport loading have been in compliance with the requirements of this Section.

Part 7, Section 39-42 applies to any facility that conducts metal cleaning. The Tank Farm and Product Loading facility have cold cleaning, vapor-type metal degreasing, or conveyORIZED degreasing units.

OAC 252:100-42 (Toxic Air Contaminants (TAC)) [Applicable]

This subchapter regulates 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 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 record keeping. It 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 252:100-7	Minor Facilities	not in source category
OAC 252:100-11	Alternative Emissions Reduction	not requested
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	Feed & Grain Facility	not in source category
OAC 252:100-47	Landfills	not in source category

SECTION IX. FEDERAL REGULATIONS

PSD, 40 CFR Part 52

[Not Applicable]

The facility is considered an existing major source for PSD. The requested permit modifications do not result in a significant emissions increase or a significant net emissions increase greater than the PSD Significant Emission Rate (SER) for any pollutant. Future projects will be evaluated in comparison to the PSD SER: 40 TPY NO_x, 100 TPY CO, 40 TPY VOC, 40 TPY SO₂, 15 TPY PM₁₀, 10 TPY PM_{2.5}, and 75,000 TPY CO_{2e}.

NSPS, 40 CFR Part 60

[Subpart Kb, UU, and GGGa Applicable]

Subpart K, Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978. The affected facility to which this subpart applies to is each storage vessel for petroleum liquids which has a storage capacity greater than 40,000 gallons. The tanks at this facility were either constructed prior or after the applicability date. Therefore, this facility is not subject to this subpart.

Subpart Ka, Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984. The affected facility to which this subpart applies to is each storage vessel for petroleum liquids which has a storage capacity greater than 40,000 gallons. The 3,400-bbl (142,800-gal) Gasoline Tank, Tank No. 605 was constructed in 1981. However, each storage vessel with a capacity of less than 420,000 gallons used for petroleum or condensate stored, processed, or treated prior to custody transfer is not an affected facility, making it exempt from the requirements of this subpart. Therefore, this facility is not applicable to this subpart.

Subpart Kb, Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, and On or Before October 4, 2023. This subpart regulates hydrocarbon storage tanks larger than 19,813 gallons capacity. EUG-01 does not contain tanks that are within the applicability date and none of the tanks have been modified or reconstructed. EUG-02 contain tanks that are within the applicability date. However, these tanks contain liquids with a vapor pressure less than 0.5 psi, thus making them not subject to this subpart. EUG-03 contains tanks within the applicability range and are therefore subject to this subpart. These tanks are equipped with internal floating roofs meeting the requirements of this subpart and which are inspected in accordance with this subpart.

Per 40 CFR §60.110b(e)(5), compliance with Subpart Kb can also be demonstrated through compliance with the provisions of NESHAP Subpart WW.

Subpart Kc, Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023. This subpart regulates hydrocarbon storage tanks larger than 20,000 gallons capacity and built after October 4, 2023. The construction of the tanks from Project 1 (Tanks No. 14A, 109A, 117A, and 131A) and Project 2 (Tanks No. 123A and 125A) was commenced prior to October 4, 2023. Therefore, this facility is not subject to this subpart.

Subpart UU, Asphalt Processing and Asphalt Roofing Manufacture. The affected facilities to which this subpart applies are each saturator and each mineral handling and storage facility at asphalt roofing plants; and each asphalt storage tank and each blowing still at asphalt processing plants, petroleum refineries, and asphalt roofing plants. Asphalt storage tank means any tank used to store asphalt at asphalt roofing plants, petroleum refineries, and asphalt processing plants. EUG-02c contains tanks that fall under this definition and are therefore subject to this subpart. These storage tanks are subject to an opacity limit of 0%.

Subpart XX, Bulk Gasoline Terminals That Commenced Construction, Modification, or Reconstruction After December 17, 1980, and On or Before June 10, 2022. The affected facility to which the provisions of this subpart apply is the total of all the loading racks at a bulk gasoline terminal which deliver liquid products into gasoline tank trucks. EUG-05a was constructed in 1951. Any work performed on the rack since 1980 has been considered insufficient to meet the definition of a modification. The butane addition is an alternate raw material, which is not a modification. Therefore, this facility is not subject to this subpart.

Subpart XXa, Bulk Gasoline Terminals that Commenced Construction, Modification, or Reconstruction After June 10, 2022. The affected facilities to which this subpart applies are each gasoline loading rack and each collection of equipment at a bulk gasoline terminal. EUG-05a is not within the applicability dates. Therefore, this facility is not subject to this subpart.

Subpart GGG, Equipment Leaks of VOC in Petroleum Refineries for which Construction, Reconstruction, or Modification Commenced After January 4, 1983, and on or Before November 7, 2006. The provisions of this subpart apply to affected facilities in petroleum refineries. A compressor and the group of all equipment within a process unit, as defined in this subpart, are affected facilities. Process unit means the components assembled to process raw materials and to produce intermediate or final products from petroleum, unfinished petroleum derivatives, or other intermediates. A process unit can operate independently if supplied with sufficient feed or raw materials and sufficient storage facilities for the product. Affected equipment in organic HAP service that are subject to this subpart and the requirements of NESHAP Subpart CC are only required to comply with Subpart CC, per § 63.640(p)(1). The permit will establish an applicable requirement that all equipment in each process unit is subject to Subpart GGGa regardless of the date of commence construction, reconstruction, or modification. Upon issuance of the permit, this facility will comply with Subpart GGGa in lieu of this subpart. For the purposes of this facility, “process unit” will include equipment leaks associated with a bulk gasoline terminal or pipeline breakout station.

Subpart GGGa, Equipment Leaks of VOC in Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006. The provisions of this subpart apply to compressors and the group of all equipment within a process unit, as defined in this subpart. Based on the stay published on June 2, 2008, of the revised definition of “process unit”, this subpart currently defines “process unit” as “components assembled to produce intermediate or final products from petroleum, unfinished petroleum derivatives, or other intermediates; a process unit can operate independently if supplied with sufficient feed or raw materials and sufficient storage facilities for the product.” The stay is effective till EPA takes final

action on this issue. Subpart GGGa requires the leak detection, repair, and documentation procedures of NSPS Subpart VVa. HEP requested a federally enforceable requirement to make Subpart GGGa requirements applicable to all process units as currently defined regardless of the date of commencement of construction, reconstruction, or modification. A specific condition has been established in the permit to require compliance with this subpart. Affected equipment in organic HAP service subject to this subpart and the requirements of Subpart CC are only required to comply with this subpart, except for PRD in organic HAP service, which must comply with Subpart CC. All applicable requirements have been incorporated into the permit. For the purposes of this facility, “process unit” will include equipment leaks associated with a bulk gasoline terminal or pipeline breakout station.

Subpart QQQ, VOC Emissions from Petroleum Refinery Wastewater System. The provisions of this subpart apply to affected facilities located in petroleum refineries for which construction, modification, or reconstruction commenced after May 4, 1987. Affected facilities include individual drain system, oil-water separator, and aggregate facility. Aggregate facility means an individual drain system together with ancillary downstream sewer lines and oil-water separators, down to and including the secondary oil-water separator. Per 40 CFR §60.692-3(d), storage vessels subject to the standards of 40 CFR Part 60 Subpart Kb (§60.112b) are not subject to the requirements of this section. There are no wastewater handling systems located at this facility. Therefore, this facility is not subject to this subpart.

NESHAP, 40 CFR Part 61

[Not Applicable]

There are no emissions of any of the regulated pollutants: arsenic, asbestos, beryllium, benzene, coke oven emissions, mercury, radionuclides, or vinyl chloride except for trace amounts of asbestos and benzene.

Subpart J, Equipment Leaks of Benzene. This subpart concerns only process streams which contain more than 10% benzene by weight. Benzene is present only in trace amounts in the streams handled at this site.

Subpart M, Asbestos. This subpart does not apply to this portion of the refinery.

Subpart Y, Benzene Storage Vessels. This facility does not have any benzene storage vessels.

Subpart BB, Benzene Transfer Operations. There are no benzene loading racks at this facility.

Subpart FF, Benzene Waste Operations. This facility is located at a petroleum refinery. However, this portion of the facility does not treat, store, or dispose of hazardous waste generated by the refinery.

NESHAP, 40 CFR Part 63

[Subpart CC Applicable]

Subpart R, Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations). Prior to May 8, 2027, the affected source to which the provisions of this subpart apply are each bulk gasoline terminal and each pipeline breakout station where the screening factor is

less than 1 or that are not located at an area source of HAP. A bulk gasoline terminal or pipeline breakout station with a SIC code 2911 located within a contiguous area and under common control with a refinery complying with §§ 63.646, 63.648, 63.649, 63.650, and 63.660 is not subject to the standards in this subpart, except as specified in § 63.650. The bulk gasoline terminal and pipeline breakout station located at this facility are subject to NESHAP Subpart CC. Subpart CC requires compliance with Subpart R §§ 63.421, 63.422(a) through (c) and (e), 63.425(a) through (c) and (e) through (i), 63.427(a) and (b), and 63.428(b), (c), (g)(1), (h)(1) through (3), and (k). If a flare is used as a control device, the flare is required to meet the requirements of §63.670.

TOC emissions to the atmosphere from the vapor collection and processing systems due to the loading of gasoline cargo tanks shall not exceed 10 mg/L of gasoline loaded. Loading is only allowed for tank trucks meeting the annual vapor tightness testing requirements of §63.425.

Loading racks at bulk gasoline terminals are required to comply with the work practices of NSPS Subpart XX §60.502 except for paragraphs (b), (c), and (j) until May 8, 2027. After May 8, 2027, the bulk gasoline terminal becomes subject to the requirements in NSPS Subpart XXa §60.502a except for paragraphs (b) and (j) and the provisions in §63.422 (b) through (c). The applicable requirements §60.502 are summarized as follows:

- The loading rack shall be equipped with a vapor collection system designed to collect vapors displaced from the tank trucks during product loading.
- Each vapor collection system shall be designed to prevent any vapors collected at one loading rack from passing to another loading rack.
- Loading into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks that are equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.
- The gasoline loading terminal must take actions to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading.

The permit incorporates all applicable requirements.

Subpart CC, Petroleum Refineries. This subpart applies to petroleum refining process units and to related emissions points that are located at a major source and that emit or have equipment containing or contacting one or more HAPs listed in Table 1 of Subpart CC. For the purposes of this subpart the affected sources comprise: miscellaneous process vents, storage vessels, wastewater streams and treatment operations, equipment leaks, gasoline loading racks, marine vessel loading operations, storage vessels and equipment leaks associated with a gasoline terminal or pipeline breakout station, heat exchange systems, and decoking operations. Of the listed affected sources, this portion of the facility contains storage vessels, gasoline loading racks, and storage vessels and equipment leaks associated with a gasoline terminal or pipeline station. Their individual applicability is listed below:

- Storage vessels: Storage tanks at an existing source equal to or larger than 40 m³ (10,567 gallons) containing any listed HAP are subject. If the tanks are greater than or equal to 177 m³ (46,758 gallons), have an annual average true vapor pressure of greater than or equal to

8.3 kPa (1.2 psia), a maximum TVP of greater than or equal to 10.4 kPa (1.5 psia), and contain more than 4% by weight of HAP, the tanks are subject to controls.

This subpart defines Group 1 storage vessels as follows:

On and after February 1, 2016:

- (i) A storage vessel at an existing source that has a design capacity greater than or equal to 151 cubic meters (40,000 gallons) and stored-liquid maximum true vapor pressure greater than or equal to 5.2 kilopascals (0.75 pounds per square inch) and annual average HAP liquid concentration greater than 4 percent by weight total organic HAP;*
- (ii) A storage vessel at an existing source that has a design storage capacity greater than or equal to 76 cubic meters (20,000 gallons) and less than 151 cubic meters (40,000 gallons) and stored-liquid maximum true vapor pressure greater than or equal to 13.1 kilopascals (1.9 pounds per square inch) and annual average HAP liquid concentration greater than 4 percent by weight total organic HAP;*
- (iii) A storage vessel at a new source that has a design storage capacity greater than or equal to 151 cubic meters (40,000 gallons) and stored-liquid maximum true vapor pressure greater than or equal to 3.4 kilopascals (0.5 pounds per square inch) and annual average HAP liquid concentration greater than 2 percent by weight total organic HAP; or*
- (iv) A storage vessel at a new source that has a design storage capacity greater than or equal to 76 cubic meters (20,000 gallons) and less than 151 cubic meters (40,000 gallons) and stored-liquid maximum true vapor pressure greater than or equal to 13.1 kilopascals (1.9 pounds per square inch) and annual average HAP liquid concentration greater than 2 percent by weight total organic HAP.*

This subpart defines Group 2 storage vessels as storage vessels that do not meet the definition of Group 1 storage vessels listed above.

Group 1 storage vessels are required to comply with 40 CFR §63.119 through §63.121 of Subpart G except as provided for in 40 CFR §63.646(b) through (l) or §63.660. Subpart G is the MACT for Process Vents, Storage Vessels, Transfer Operations, and Wastewater at Synthetic Organic Chemical Manufacturing Industries (SOCMI). Any substantive exceptions have been identified in the Specific Conditions of this permit. The compliance date for new tanks is first operation, and the compliance date for all existing tanks was August 18, 2005.

EUG-01 contains Group 1 Storage vessels and will comply with NESHAP Subpart CC.

EUG-02 contains Group 2 Storage vessels and will comply with NESHAP Subpart CC.

EUG-03 contains tanks subject to NSPS Subpart Kb. Tanks that are subject to NSPS Subpart Kb and to NESHAP Subpart CC are only required to comply with NSPS Subpart Kb, except as provided in §63.640(n)(8).

- Gasoline loading racks: Per §63.650, Group 1 gasoline loading racks are required to comply with the provisions of 40 CFR Part 63 Subpart R. The vapor combustor device requires a continuous parameter monitoring system (CPMS), per Subpart R §63.427.
- Equipment leaks associated with a gasoline terminal or pipeline station: Per §63.648, equipment leaks are required to comply with the provisions of NSPS Subpart VV and §63.648(b), except as provided in §§63.648(a)(1) through (3) and (c) through (j). The provisions of this subpart only apply to equipment in organic HAP service (>5% HAP). Equipment leaks that are also subject to the provisions of NSPS Subpart GGGa are only required to comply with the provisions of NSPS Subpart GGGa, except that PRD in organic HAP service must comply with the requirements in § 63.648(j).

The permit incorporates all applicable requirements.

Subpart UUU, Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units. This facility does not contain any of the listed affected sources and is not subject to this subpart.

Subpart EEEE, Organic Liquid Distribution (OLD) (Non-Gasoline). This subpart affects OLD operations that are located at a major source of HAP emissions. OLD operation means the collection of activities and equipment used to distribute organic liquids into, out of, or within a facility. The affected source is comprised of: storage tanks, transfer racks, equipment leak components, and transport vehicles and containers that are being loaded/unloaded. Organic liquid is any non-crude oil liquid, non-condensate liquid, or liquid mixture that contains 5% by weight or greater of an organic HAP listed in Table 1 of this subpart. The definition of organic liquid excludes gasoline, kerosene, diesel, asphalt, and heavier distillate oils and fuel oils, and any liquid with a true vapor pressure less than 0.1 psia. Since the facility does not transfer any organic liquids as defined by this subpart, the facility does not operate an OLD operations. Therefore, this facility is not subject to this subpart.

Subpart LLLLL, Asphalt Processing and Asphalt Roofing Manufacturing. This subpart affects asphalt processing facilities or asphalt roofing manufacturing facilities. Asphalt processing facility means any facility engaged in the preparation of asphalt flux at stand-alone asphalt processing facilities, petroleum refineries, and asphalt roofing facilities. Asphalt preparation, called “blowing,” is the oxidation of asphalt flux, achieved by bubbling air through the heated asphalt, to raise the softening point and to reduce penetration of the oxidized asphalt. An asphalt processing facility includes one or more asphalt flux blowing stills, asphalt flux storage tanks storing asphalt flux intended for processing in the blowing stills, oxidized asphalt storage tanks, and oxidized asphalt loading racks

The facility contains asphalt storage tanks that store asphalt flux but are not intended for processing in blowing stills. The facility does not have a blowing still. The asphalt loading rack does not process oxidized asphalt. Therefore, the facility is not subject to this subpart.

Subpart BBBBBB, Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. This subpart affects area source gasoline distribution bulk terminals, bulk plants, and pipeline facilities. This facility is a major source and is not subject to this subpart.

Subpart CCCCCC, Gasoline Dispensing Facilities (GDF). The affected source to which this subpart applies is each GDF that is located at an area source. The facility is not an area source of HAPs. Therefore, the facility is not subject to this subpart.

CAM, 40 CFR Part 64

[Applicable]

Compliance Assurance Monitoring (CAM) 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; and
- It has the potential emissions, prior to the control device, of the applicable regulated air pollutant of greater than the major source thresholds.

Each emission unit within the facility that is subject to an emissions limit is subject to a standard under NSPS or NESHAP that was promulgated after November 15, 1990. Under 40 CFR §64.2(b)(i), CAM does not affect emissions limits or standards proposed by the Administrator after November 15, 1990, pursuant to Section 111 or 112 of the Act.

Chemical Accident Release Prevention Provisions, 40 CFR Part 68

[Applicable]

Naturally occurring hydrocarbon mixtures, prior to entry into a natural gas processing plant or a petroleum refining process unit, including condensate, crude oil, field gas, and produced water, are exempt for the purpose of determining whether more than a threshold quantity of a regulated substance is present at the stationary source. Listed materials produced and held for sale as fuel are also exempt. More information on this federal program is available on the webpage: www.epa.gov/rmp.

Stratospheric Ozone Protection, 40 CFR Part 82

[Subparts A and F 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 Standard Conditions of the permit address the requirements specified at §82.156 for persons opening appliances for maintenance, service, repair, or disposal; §82.158 for equipment used during the maintenance, service, repair, or disposal of appliances; §82.161 for certification by an approved technician certification program of persons performing maintenance, service, repair, or disposal of appliances; §82.166 for recordkeeping; §82.158 for leak repair requirements; and §82.166 for refrigerant purchase records for appliances normally containing 50 or more pounds of refrigerant.

SECTION X. COMPLIANCE

COMPLIANCE AND ENFORCEMENT CASE

The following enforcement cases have been opened or resolved since issuance of the last Part 70 renewal permit, Permit No. 2018-0593-TVR (M-5), issued on January 5, 2023:

On July 28, 2023, HEP submitted a voluntary self-disclosure for this facility which resulted in Enforcement Case No. 11717. The self-disclosure stated there were the following violations:

- 1.) HEP failed to submit notification of multiple tank inspections and records of tank inspection failures as outlined in NSPS Subpart Kb.
- 2.) HEP failed to submit notification of multiple tank inspections and records of tank inspection failures as outlined in NESHAP Subpart WW.
- 3.) HEP failed to comply with Specific Condition No. 2 of Permit No. 2018-0593-TVR (M-4) requirements due to the above-mentioned violations.

HEP appropriately addressed the non-compliance issues by submitting tank inspection records with the disclosure submittal and implementing procedures to ensure future submittals are timely. This enforcement case was closed on November 2, 2023.

On July 30, 2024, HEP submitted a voluntary self-disclosure for this facility which resulted in Enforcement Case No. 12975. The self-disclosure stated there were the following violations:

- 1.) HEP failed to submit tank replacement notifications as required under NSPS Subpart Kb and NESHAP Subpart CC.

HEP implemented an internal procedure to ensure future notifications are submitted timely. This enforcement case was closed on September 25, 2024.

On February 26, 2025, a full compliance evaluation was conducted, which resulted in Enforcement Case No. 13390. The evaluation found the following violations:

- 1.) HEP failed to conduct the emptied/degassed inspection of certain tanks within 10 years of the previous inspection as required under §63.1063(c)(1)(i)(B), NESHAP Subpart WW.
- 2.) HEP failed to comply with Specific Condition No. 2, EUG 15e of Permit No. 2018-0593-TVR (M-5) by allowing the vapor processing system firebox temperature to fall below the operating parameter value of 500 °F
- 3.) HEP failed to maintain the continuous monitoring data as outlined in NESHAP Subpart R §63.427(a), resulting in a violation of §63.428(c)(1).

DEQ considered this case closed as of April 7, 2025.

There are no active Air Quality compliance or enforcement issues concerning this facility.

INSPECTION

The following periodic inspections have been conducted since issuance of the last Part 70 renewal permit, Permit No. 2018-0593-TVR (M-5), issued on January 5, 2023:

On June 27, 2023, a full compliance evaluation was conducted on-site by DEQ Enforcement Inspectors Allie Foster and Drake Hanna. They were accompanied by Justin Battershell, Environmental Air Compliance Lead for HF Sinclair, who represented HEP. No violations were discovered.

On February 26, 2025, a full compliance evaluation was conducted on-site by DEQ Enforcement Inspectors Allie Foster, Charles Forbes, Keli Pearson, and Mackenzie Mathews. They were accompanied by Brett Mattingly, Environmental Specialist, who represented HEP. Based on the information obtained during this evaluation, Enforcement Case No. 13390 was opened. This case was closed on April 7, 2025.

FEE PAID

The fee of \$5,000 for a modification of a Part 70 construction permit application was paid. Subsequently, the fee of \$3,000 (\$6,000 total) for a minor modification (M-6 and M-7) of a Part 70 permit application was paid. The changes requested in those modifications have been incorporated into this permit.

SECTION XI. TIER CLASSIFICATION, PUBLIC AND EPA REVIEW**TIER CLASSIFICATION**

The modifications requested in 2018-0593-TVR (M-6) and 2018-0593-TVR (M-7) applications have been determined to be a **Tier I**, based on the request for a minor modification to an existing major source permit, which have been incorporated into this construction permit for a conservative approach. OAC 252:100-8-7.2(b)(1)(A)(i) states that minor permit modification procedures may be used only for those permit modifications that:

- (I) Do not violate any applicable requirement or state-only requirement;

The requested permit modifications do not violate any applicable requirement or state-only requirement

- (II) Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

The requested permit modifications do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements. All tanks remain subject to 40 CFR Part 63, Subpart CC with the exception of Tank No. 14A which will now also be subject to 40 CFR Part 60, Subpart Kb. The addition in applicability does not relax any monitoring, reporting, or recordkeeping requirements.

- (III) Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;

The requested change does not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis.

- (IV) Do not seek to establish or change a permit term or conditions for which there is no underlying applicable requirements or state-only requirement to which the source would otherwise be subject. Such terms and conditions include federally-enforceable emission caps assumed to avoid classification as a modification under any provision of Title I and alternative emissions limits approved pursuant to regulations promulgated under §122(i)(5) of the ACT; and

The requested change does not seek to establish or change a permit or condition to avoid applicable requirements.

- (V) Are not modifications under any provision of Title I of the Act.

New Source Performance Standards (NSPS):

Under Section 111 of the Act, the term “modification” means any physical change in, or change in the method of operation of, a stationary source which increases the amount

of any air pollutant emitted by such source or which results in the emission of any air pollutant not previously emitted. However, the different provisions of Title I of the Act are modified by the applicable regulations which implement them. 40 CFR Part 60, NSPS implements Section 111 of the Act and defines the term “modification” in §60.14 as any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies.

Tank No. 14A is now also subject to 40 CFR Part 60, Subpart Kb. However, installation of the tank is not considered a “modification” under Section 111 of the Act, 40 CFR §60.14, or 40 CFR Part 60, Subpart Kb.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

Under Section 112 of the Act, the term "modification" means any physical change in, or change in the method of operation of, a major [HAP] source which increases the actual emissions of any HAP emitted by such source by more than a de minimis amount or which results in the emission of any HAP not previously emitted by more than a de minimis amount. The EPA determined through rulemaking to not implement the requirements for modification of major HAP sources in 40 CFR Part 63 because major HAP sources would become subject to the requirements of the promulgated MACT standards.

The tanks are subject to 40 CFR Part 63, Subpart CC.

Prevention of Significant Deterioration (PSD):

Under Section 169 of the Act, the term “construction: includes the term “modification” (as defined in Section 111 of the Act) of any source or facility. PSD is implemented by 40 CFR §52.21 and OAC 252:100-8, Part 7 and only affects major modifications or modifications that cause a significant emission increase and a significant net emission increase.

The projected emissions increased from the installation of new tanks are less than the PSD significant emission rates as discussed in Section III of this Memorandum.

Non-attainment New Source Review (NNSR):

The facility is not located in a non-attainment area. Therefore, the requirements for modification under NNSR do not apply.

Based on these determinations, the requested permit changes are not modifications under any provision of Title I of the Act.

This construction application has been determined to be a **Tier II**, based on the request for a Part 70 construction permit that is a significant modification 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. The permit will be processed under the enhanced procedure.

PUBLIC, STATE, AND TRIBAL REVIEW

The applicant has published a “Notice of Filing a Tier II Application” in the *Tulsa World*, a local newspaper in Tulsa County on February 15, 2025. The notice stated that the application was available for public review at the facility or the DEQ office in Oklahoma City as well as the Central Library in Tulsa, Oklahoma.

The applicant will publish a “Notice of Tier II Draft Permit”. The notice will state that the draft permit will be available for public review at the facility or the DEQ office in Oklahoma City. 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.

This facility is not located within 50 miles of the border of Oklahoma. Therefore, notice is not required to be sent to any state bordering Oklahoma.

This facility is located in Tulsa County. Tribal Nations will be notified of the drafted permit.

EPA REVIEW

The draft/proposed permit will be forwarded to EPA Region VI for a 45-day review period. This permit was approved for concurrent public and EPA review. If no comments are received from the public, the proposed/draft permit will be deemed the proposed permit.

If the Administrator does not object in writing during the 45-day EPA review period, any person that meets the requirements of OAC 252:100-8-8(j) may petition the Administrator within 60 days after the expiration of the Administrator's 45-day review period to make such objection. Any such petition shall be based only on objections to the permit that the petitioner raised with reasonable specificity during the public comment period provided for in 27A O.S. § 2-14-302.A.2., unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period. If the Administrator objects to the permit as a result of a petition filed under OAC 252:100-8-8(j), the DEQ shall not issue the permit until EPA's objection has been resolved, except that a petition for review does not stay the effectiveness of a permit or its requirements if the permit was issued after the end of the 45-day review period and prior to an EPA objection. If the DEQ has issued a permit prior to receipt of an EPA objection under OAC 252:100-8-8(j), the DEQ will modify, terminate, or revoke such permit, and shall do so consistent with the procedures in 40 CFR §§ 70.7(g)(4) or (5)(i) and (ii) except in unusual circumstances. If the DEQ revokes the permit, it may thereafter issue only a revised permit that satisfies EPA's objection. In any case, the source will not be in violation of the requirement to have submitted a timely and complete application.

SECTION XII. SUMMARY

The facility is constructed 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 that would prevent issuance of the permit. Issuance of the permit is recommended, contingent on public, tribal, and EPA review.

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

Holly Energy Partners Tulsa, LLC

Tulsa Refinery Tank Farm and Product Loading

Permit No. 2018-0593-C (M-9)

The permittee is authorized to construct in conformity with the specifications submitted to Air Quality on January 2, 2025. The Evaluation Memorandum dated September 19, 2025, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Commencing construction and continuing operations under this permit constitutes acceptance of, and consent to, the conditions contained herein:

1. The permittee shall be authorized to operate the affected facilities noted in this permit continuously (24 hours per day, every day of the year) subject to the following conditions. Records necessary to show compliance with each of the requirements below must be maintained. [OAC 252:100-8-6(a)(1)]

- a. The following tanks have the throughput and emission limits specified below:

EUG	Tank No.	Throughput Limit (bbl/yr)	Emission Limit (TPY)
03	4	45,600,000	- ⁽¹⁾
02a	9	19,000,000	- ⁽¹⁾
03	14A	35,040,000	7.55
02a	16	19,000,000	- ⁽¹⁾
03	31	430,080	- ⁽¹⁾
02a	109A	17,520,000	4.04
02a	117A	35,040,000	3.87
02a	123A	8,760,000	4.04
02a	125A	8,760,000	2.70
02a	131A	17,520,000	2.70

⁽¹⁾ Only throughput limits were established for these tanks in their respective permits (Tank No. 4 in 98-021-C (M-15), Tank No. 9 in 98-021-C (M-28), Tank No. 16 in 98-021-TV M-40), and Tank No. 31 in 98-021-TV (M-39).

2. Emission limitations and points of emissions: [OAC 252:100-8-6(a)]

- a. **EUG-01: Group 1 Storage Vessels Subject to NESHAP CC – IFR**

There are no specific emission limitations for the following emission units:

Tank No.	Point ID#	Roof Type	Description	Rating	Construction Date
1	6173	IFR	Crude Oil Tank	130,000-bbl	1949
2	6174	IFR	Crude Oil Tank	131,000-bbl	1949
3	6175	IFR	Crude Oil Tank	130,000-bbl	1949

Tank No.	Point ID#	Roof Type	Description	Rating	Construction Date
8	6179	IFR	Crude Oil Tank	130,000-bbl	1949
460	6232	IFR	Naphtha Tank	80,000-bbl	1927
601	6276	IFR	Gasoline Tank	18,500-bbl	1951
602	6277	IFR	Denatured Ethanol Tank	9,700-bbl	1951

- i. The affected storage vessels are subject to the NESHAP for Hazardous Air Pollutants From Petroleum Refiners 40 CFR Part 63, Subpart CC, and shall comply with all applicable requirements including, but not limited to:

[40 CFR § 63.640 through § 63.671]

1. § 63.642 General standards.
2. § 63.646 Storage vessel provisions.
3. § 63.660 Storage vessel provisions.
 - a. After April 29, 2016, Group 1 storage vessels constructed prior to July 14, 1994, storing liquid with a maximum true vapor pressure less than 11.1 psi shall comply with the requirements in 40 CFR Part 63 Subparts WW or SS.
4. § 63.655 Reporting and recordkeeping requirements.

- ii. Records that shall be maintained include, but are not limited to, tank dimensions and capacity, inspections, and extension.
- iii. Reports that shall be maintained include, but are not limited to, periodic reports and notifications prior to refilling
- iv. These tanks may switch between Group 1 and Group 2 service per the requirements of NESHAP Subpart CC.
- v. These tanks shall not store VOC with vapor pressures greater than or equal to 11.1 psia under actual storage conditions. [OAC 252:100-37-15 & 39-4]

b. EUG-02a: Group 2 Storage Vessels Subject to NESHAP CC – FR

There are no specific emission limitations for the following emission units:

Tank No.	Point ID#	Roof Type	Description	Rating	Construction Date
9	6242	FR	Vacuum Residual Oil Tank	151,000-bbl	2005
10A	6180	FR	Diesel Tank	67,000-bbl	2019
11	6181	FR	Diesel Tank	37,500-bbl	1910
15	6244	FR	Vacuum Residual Oil Tank	130,000-bbl	1949
16	6245	FR	Vacuum Residual Oil Tank	151,100-bbl	2003
17	6183	FR	Diesel Tank	37,500-bbl	1910
40	6185	FR	Vacuum Residual Oil Tank	6,100-bbl	1923
41	6248	FR	Crude Oil Tank	1,000-bbl	1973
102	6189	FR	Diesel Tank	37,500-bbl	1907
103	6190	FR	Diesel Tank	37,500-bbl	1907
104	6255	FR	Diesel Tank	37,500-bbl	2012

Tank No.	Point ID#	Roof Type	Description	Rating	Construction Date
108A	6191	FR	Vacuum Residual Oil Tank	37,500-bbl	2015
110A	6193	FR	Diesel Tank	67,000-bbl	2020
115	38828	FR	Diesel Tank	150,000-bbl	2007
215	38842	FR	Diesel Tank	150,000-bbl	2007
122	6203	FR	Vacuum Residual Oil Tank	37,500-bbl	1907
452A	6230	FR	Diesel Tank	11,500-bbl	2015
45A	TK45A	FR	Vacuum Residual Oil Tank	6,000-bbl	2015

- i. The affected storage vessels are only subject to the recordkeeping requirements of NESHAP for Hazardous Air Pollutants From Petroleum Refiners 40 CFR Part 63, Subpart CC, and shall comply with the requirements as follows:
[40 CFR § 63.655(i)(1)(iv)]

- Records shall be readily accessible, showing the dimensions of each vessel and shall maintain an analysis of the capacity of each vessel for the life of the vessel.
[40 CFR § 63.123(a)]
- Documents shall be maintained for data, assumptions, and procedures used in determining Group 2 status for each vessel.
[40 CFR § 63.646(b)(1)]

- ii. These tanks shall not store VOC with vapor pressures greater than or equal to 1.5 psia under actual storage conditions.
[OAC 252:100-37-15 & 39-4]

c. EUG-02b: Group 2 Storage Vessels Subject to NESHAP CC – EFR

There are no specific emission limitations for the following emission units:

Tank No.	Point ID#	Roof Type	Description	Rating	Construction Date
114	6197	EFR	Diesel Tank	131,000-bbl	1949

- i. The affected storage vessels are only subject to the recordkeeping requirements of NESHAP for Hazardous Air Pollutants From Petroleum Refiners 40 CFR Part 63, Subpart CC, and shall comply with the requirements as follows:
[40 CFR § 63.655(i)(1)(iv)]

- Records shall be readily accessible, showing the dimensions of each vessel and shall maintain an analysis of the capacity of each vessel for the life of the vessel.
[40 CFR § 63.123(a)]
- Documents shall be maintained for data, assumptions, and procedures used in determining Group 2 status for each vessel.
[40 CFR § 63.646(b)(1)]

- ii. These tanks shall not store VOC with vapor pressures greater than or equal to 1.5 psia under actual storage conditions.
[OAC 252:100-37-15 & 39-4]

d. EUG-02c: Group 2 Storage Vessels Subject to NESHAP CC and NSPS UU – FR

There are no specific emission limitations for the following emission units:

Tank No.	Point ID#	Roof Type	Description	Rating	Construction Date
107	6257	FR	Vacuum Residual Oil Tank	55,000-bbl	2012
124	6261	FR	Vacuum Residual Oil Tank	37,500-bbl	2014
34A	6252	FR	Vacuum Residual Oil Tank	11,752-bbl	2016
36A	6253	FR	Vacuum Residual Oil Tank	11,752-bbl	2023

- i. The affected storage vessels are only subject to the recordkeeping requirements of NESHAP for Hazardous Air Pollutants From Petroleum Refiners 40 CFR Part 63, Subpart CC, and shall comply with the requirements as follows:

[40 CFR § 63.655(i)(1)(iv)]

1. Records shall be readily accessible, showing the dimensions of each vessel and shall maintain an analysis of the capacity of each vessel for the life of the vessel.

[40 CFR § 63.123(a)]

2. Documents shall be maintained for data, assumptions, and procedures used in determining Group 2 status for each vessel.

[40 CFR § 63.646(b)(1)]

- ii. The affected storage vessels are subject to the NSPS Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture 40 CFR Part 60, Subpart UU, and shall comply with all applicable requirements including, but not limited to:

[40 CFR § 60.470 through § 60.474]

1. § 60.470 Applicability and designation of affected facilities.
2. § 60.471 Definitions.
3. § 60.472 Standards for particulate matter.
4. § 60.473 Monitoring of operations.
5. § 60.474 Test methods and procedures.

- iii. These tanks shall not store VOC with vapor pressures greater than or equal to 1.5 psia under actual storage conditions.

[OAC 252:100-37-4 & 39-4]

e. EUG-03: Storage Vessels Subject to NSPS Kb – IFR

There are no specific emission limitations for the following emission units:

Tank No.	Point ID#	Roof Type	Description	Rating	Construction Date
4	23129	IFR	Gasoline Tank	120,600-bbl	2003
6A	6177	IFR	Gasoline Tank	54,000-bbl	2013
7A	6178	IFR	Gasoline Tank	73,000-bbl	2014
31	6250	IFR	Crude Oil Tank	15,000-bbl	1998

Tank No.	Point ID#	Roof Type	Description	Rating	Construction Date
472	6240	IFR	Gasoline Tank	140,000-bbl	2007
605	6278	IFR	Gasoline Tank	3,400-bbl	1987
450A	6228	IFR	Gasoline Tank	12,000-bbl	2012
445	6223	IFR	Gasoline Tank	30,000-bbl	2012
464	6234	IFR	Gasoline Tank	80,000-bbl	2013
466A	6236	IFR	Out of Service	80,000-bbl	2022
467A	6252	IFR	Gasoline Tank	80,000-bbl	2013
470A	6238	IFR	Gasoline Tank	80,000-bbl	2013
473A	6241	IFR	Gasoline Tank	80,000-bbl	2013
444A	1	IFR	Gasoline Tank	32,147-bbl	2015
461A	6233	IFR	Gasoline Tank	73,183-bbl	2015
18A	6246	IFR	Crude Oil Tank	41,079-bbl	2015
12	TK12	IFR	Gasoline Tank	32,000-bbl	2015
116A	6199	IFR	Diesel Tank	50,000-bbl	2016
465A	6235	IFR	Gasoline Tank	80,000-bbl	2016
471A	6239	IFR	Gasoline Tank	150,000-bbl	2016
11A	6181	IFR	Diesel Tank	50,000-bbl	2018

- i. The affected storage vessels are subject to the NSPS for Volatile Organic Liquid Storage Vessels 40 CFR Part 60, Subpart Kb. Per 40 CFR §63.640(n)(2), Group 1 storage vessels subject to 40 CFR Part 60, Subpart Kb, are only required to comply with 40 CFR Part 60, Subpart Kb, except as provided in §63.640(n)(8). Per 40 CFR §60.110b(e)(5), compliance with Subpart Kb can also be demonstrated through compliance with the provisions of NESHAP Subpart WW. As such, the affected storage vessels shall demonstrate compliance with the provisions of Subpart WW including, but not limited to: [40 CFR § 63.1060 through § 63.1067]
 1. § 63.1060 Applicability.
 2. § 63.1061 Definitions.
 3. § 63.1062 Storage vessel control requirements.
 4. § 63.1063 Floating roof requirements.
 5. § 63.1064 Alternative means of emission limitation.
 6. § 63.1065 Recordkeeping requirements.
 7. § 63.1066 Reporting requirements.
 8. § 63.1067 Implementation and enforcement.
- ii. The affected storage vessels in this EUG may be used in NESHAP Subpart CC Group 1 wastewater service, as they comply with § 61.351 Alternative standards for storage tanks and 40 CFR Part 60, Subpart Kb.
- iii. Recordkeeping requirements shall include inspection results, dimensions and capacity of the storage vessels, VOL stored, period of storage, and maximum TVP. [40 CFR § 60.110b and §60.115b]

- iv. Reporting requirements shall include semi-annual reporting of deviations during inspections, notifications, and initial certifications.

[40 CFR §60.110b and §60.115b]

f. EUG-04: Low Vapor Pressure Loading Operations

This EUG handles materials that are not treated as VOC under OAC 252:100-37 and 39. This EUG was constructed in 1949, prior to any applicable rules, and is considered “grandfathered”. There are no emission limits or compliance obligations applied to this EUG under Title V but it is limited to the currently existing equipment.

Rack	Point ID#	Description	Rating	Construction Date
Black Oil Railcar	6169	Asphalt, Flux, and Vacuum Tower Bottoms from East Refinery Rack	12 cars	1949
Black Oil Truck	6170	Asphalt, Flux, and Vacuum Tower Bottoms from East Refinery Rack	3 trucks	1949
Diesel Railcar	14488	Diesel from East Refinery Rack	8 cars	1949
Gas Oil Truck	6481	Gas Oils Truck Rack	2 trucks	1949

- i. The loading operations are limited to materials that have vapor pressures less than 1.5 psia under actual storage conditions.

[OAC 252:100-37-4 & 39-4]

g. EUG-05a: High Vapor Pressure Loading Operations Subject to NESHAP CC

There are no specific emission limitations for the following emission units:

Rack	Point ID#	Description	Rating	Construction Date
Terminal	6275	Gasoline, Ethanol, and Diesel Rack	4 trucks	1951

ID#	Point ID#	Description	Rating	Construction Date
VCU	6275	Vapor Combustion Unit	55-MMBTUH	2013

- i. The loading rack diesel throughput shall not exceed 229,950,000 gallons, the gasoline throughput shall not exceed 593,271,000 gallons, and the ethanol throughput shall not exceed 65,919,000 gallons (all based on a 12-month rolling total).
- ii. The gasoline loading rack is subject to the NESHAP for Hazardous Air Pollutants From Petroleum Refineries 40 CFR Part 63 Subpart CC. Per Subpart CC §63.650, Group 1 gasoline loading racks are required to comply with the following provisions of 40 CFR Part 63 Subpart R, §§ 63.421, 63.422(a) through (c) and (e), 63.425(a) through (c) and (e) through (i), 63.427(a) and (b), and 63.428(b), (c), (g)(1), (h)(1) through (3), and (k), except as provided in §63.650(b) through (d). As such, the gasoline loading rack shall comply with all applicable requirements

including, but not limited to the following requirements of 40 CFR Part 63 Subpart R and 40 CFR Part 60 Subpart XX, as referenced:

1. Loading rack standards and operating specifications per 40 CFR § 60.502, except for §60.502(b), (c), and (j). [40 CFR § 63.422(a)]
 2. Prior to May 8, 2027, the emission limit of §63.422(b)(1) shall apply. On May 8, 2027, the emission limit of § 60.502a(c) shall apply. [40 CFR § 63.422(b)]
 3. The gasoline cargo tank truck requirements of § 63.422(c).
 4. Alternative compliance options of § 63.422(e).
 5. Test methods and procedures. [40 CFR § 63.425(a, b, c, e, f, g, h, i)]
 6. Continuous Monitoring. [40 CFR § 63.427(a) and (b)]
 - a. The loading rack shall include a continuous parameter monitoring system (CPMS) capable of measuring temperature that is in the ductwork immediately downstream from the firebox in a position before any substantial heat exchange occurs. The system shall shut down in the absence of a flame. [40 CFR § 63.427(a)(3)]
 7. Recordkeeping and Reporting. [40 CFR 63.428(b), (c), (g)(1), (h)(1) through (3), and (k)]
- iii. The gasoline loading rack is subject to certain standards that are met through compliance with NESHAP Subpart CC (S.C. 2(g)(ii) above). [OAC 252-39-41(c) and (d)]
 - iv. The firebox temperature and assist gas shall be monitored to demonstrate proper operation. Loading operations will be considered to be in compliance with Subpart CC and Subpart R if the VCU is signaling the assist gas valve to open when the temperature is below 500 °F.
 - v. The VCU shall be operated in the temperature range of 1,500 °F to 2,000 °F. Continuous records of operating temperature shall be kept when the unit is operated.
 - vi. The permittee shall maintain records of operations as listed below. These records shall be maintained on-site or a local field office for at least five years after the date of recording and shall be provided to regulatory personnel upon request.
 1. Records required under NESHAP 40 CFR Part 63 Subpart R as referenced under NESHAP Subpart CC Table 4. [40 CFR § 63.655(b)]
 2. Firebox operating temperatures and assist gas valve position (continuously when loading gasoline).
 - vii. Reporting requirements shall meet NESHAP 40 CFR Part 63 Subpart R as referenced under NESHAP Subpart CC Table 4. [40 CFR § 63.655(b)]
 - viii. The VCU shall be operated to minimize emissions of VOC. Among other things, such operation shall assure, based on manufacturer's data and good engineering practice, that the equipment is not overloaded; that it is properly cleaned, operated, and maintained; and that temperature and available air are sufficient to provide essentially complete combustion. [OAC 252:100-37-36]

- ix. Stationary loading facilities shall be checked annually in accordance with EPA Test Method 21 or an alternative work practice for monitoring equipment for leaks consistent with 40 CFR Section 60.18(g) through 60.18(i). [OAC 252-39-41(e)(3)]
- x. Leaks greater than 5,000 ppmv measured by EPA Test Method 21 or leaks detected by an alternative work practice for monitoring equipment leaks, shall be repaired within 15 days. [OAC 252-39-41(e)(3)]

h. EUG-05b: High Vapor Pressure Loading Operations

There are no specific emission limitations for the following emission units:

Rack	Point ID#	Description	Rating	Construction Date
Terminal	6275	Propane Rack	2 trucks	2015

- i. All tank trucks or trailers shall be pressure vessels capable of maintaining working pressures that prevent the loss of VOC to the atmosphere. [OAC 252:100-37 and 39-41(d)]
- ii. All loading and vapor lines shall be equipped with fittings that make vapor-tight connections and which must be closed when disconnected or which close automatically when disconnected. [OAC 252:100-37 and 39-41(c)]
- iii. A means shall be provided to prevent VOC drainage from the loading device when it is removed from any tank truck or trailer, or to accomplish complete drainage before removal. [OAC 252:100-37 and 39-41(c)]
- iv. Stationary loading facilities shall be checked annually in accordance with EPA Test Method 21 or an alternative work practice for monitoring equipment for leaks consistent with 40 CFR Section 60.18(g) through 60.18(i). [OAC 252:100-39-41(e)(3)]
- v. Leaks greater than 5,000 ppmv measured by EPA Test Method 21 or leaks detected by an alternative work practice for monitoring equipment leaks, shall be repaired within 15 days. [OAC 252:100-39-41(e)(3)]
- vi. The permittee shall maintain records of operations as listed below. These records shall be maintained on-site or at a local field office for at least five years after the date of recording and shall be provided to regulatory personnel upon request.
 - 1. Throughput and emission records shall be maintained for the propylene racks to demonstrate their continued status as Insignificant Activity. [OAC 252:100-43]

i. EUG-06: Fugitive Emissions

There are no emission limits applied to this EUG under Title V. Equipment leaks are subject to the LDAR requirements of OAC 252:100-39-15 and the LDAR requirements of NESHAP Subpart CC and NSPS Subpart GGG. The facility shall also comply with NSPS Subpart GGGa for all applicable equipment. As such, the permittee shall demonstrate compliance by meeting the following conditions:

- i. All affected equipment, in HAP service (contacting > 5% by weight HAP), shall comply with NESHAP, 40 CFR Part 63, Subpart CC. The permittee shall comply with the applicable sections for each affected component.
[40 CFR Part 63 Subpart CC]
 1. § 63.640 Applicability and Designation of Affected Source
 2. § 63.642 General Standards – (c), (d)(1), (e), and (f);
 3. § 63.648 Equipment Leak Standards – (a), (b), (c), and (e-i);
 4. § 63.654 Reporting and Recordkeeping Requirements – (d), and (f-h)
- ii. The permittee shall comply with the requirements of NSPS 40 CFR Part 60, Subpart GGGa for all process units regardless of the date of commencement of construction, reconstruction, or modification. [40 CFR Part 60, Subpart GGGa]
 1. The owner or operator shall comply with the requirements of § 60.482-1a through § 60.482-10a, except as provided in § 60.593a. [§ 60.592a(a)]
 - a. Compressors in hydrogen service are exempt from the requirements of § 60.592a if an owner or operator demonstrates that a compressor is in hydrogen service. [§ 60.593a(b)(1)]
 - b. § 60.482-1a Standards: General.
 - c. § 60.482-2a Standards: Pumps in light liquid service.
 - d. § 60.482-3a Standards: Compressors.
 - e. § 60.482-4a Standards: Pressure relief devices in gas/vapor service.
 - f. § 60.482-5a Standards: Sampling connection systems.
 - g. § 60.482-6a Standards: Open-ended valves or lines.
 - h. § 60.482-7a Standards: Valves in gas/vapor service and in light liquid service.
 - i. § 60.482-8a Standards: Pumps, valves, and connectors in heavy liquid service and pressure relief devices in light liquid or heavy liquid service.
 - j. § 60.482-9a Standards: Delay of repair.
 - k. § 60.482-10a Standards: Closed vent systems and control devices.
 - l. An owner or operator may elect to comply with the alternative requirements for valves of §§ 60.483-1a and 60.483-2a. [§ 60.592a(b) & § 60.482-1a(b)]
 2. Each owner or operator subject to the provisions of NSPS Subpart GGGa shall comply with the test methods and procedures of § 60.485a except as provided in § 60.593a. [§ 60.592a(d)]
 3. Each owner or operator subject to the provisions of NSPS Subpart GGGa shall comply with the recordkeeping requirements of § 60.486a and the reporting requirements of § 60.487a. [§ 60.592a(e)]
- iii. The equipment leak components at the facility are subject to certain standards that are met through compliance with NSPS Subpart GGGa (Specific Condition 2(h)(ii) above). [OAC 252-39-15]

1. A monitoring program must be developed which is consistent with the provisions in 252:100-39-15(d) and (f). Applicable equipment shall comply with the requirements outlined in OAC 252:100-39-15. [OAC 252:100-39-15]
 - a. Assure that all lines or pipes terminating with a valve are sealed with a second valve, a blind flange, a plug, or a cap.
[OAC 252:100-39-15(c)(1)(E)]
 - b. The Division Director may require appropriate remedial action based on the number and severity of tagged leaks awaiting repair.
[OAC 252:100-39-15(c)(2)]
 - c. Pipeline valves and pressure relief valves in gas service shall be marked in some manner that is readily obvious to both monitoring and DEQ personnel.
[OAC 252:100-39-15(c)(3)]
 - d. Testing and calibration procedures to determine compliance must be consistent with EPA Test Method 21 of 40 CFR Part 60.
[OAC 252:100-39-15(e)]
 - e. Monitor yearly by the methods referenced in OAC 252:100-39-15(e) all pump seals, pipeline valves in liquid service, and process drains;
[OAC 252:100-39-15(f)(1)(A)]
 - f. Monitor quarterly by the methods referenced in OAC 252:100-39-15(e) all compressor seals, pipeline valves in gas service, and pressure relief valves in gas service;
[OAC 252:100-39-15(f)(1)(B)]
 - g. Monitor weekly by visual methods all pump seals;
[OAC 252:100-39-15(f)(1)(C)]
 - h. Monitor within 24 hours any pump seal from which VOC liquids are observed to be dripping;
[OAC 252:100-39-15(f)(1)(D)]
 - i. Monitor any relief valve within 24 hours after it has vented to the atmosphere; and
[OAC 252:100-39-15(f)(1)(E)]
 - j. Monitor immediately after repair any component that was found leaking.
[OAC 252:100-39-15(f)(1)(F)]
 - k. Pressure relief devices that are connected to an operating flare header, vapor recovery devices, inaccessible valves, storage tank valves, and valves that are not externally regulated are exempt from the above monitoring requirements, provided such inaccessible valves will be monitored during annual shutdown.
[OAC 252:100-39-15(f)(2)]
 - l. Repairs and retesting of the leaking components should be done as soon as possible, but no later than 15 days after the leak is found.
[OAC 252:100-39-15(c)(1)(C)]
 - m. Upon detection of a leaking component that is not repaired on discovery, a weatherproof and readily visible tag with an identification number and date the leak is located, shall be affixed to the leaking component. The tag shall remain in place until the leaking component is repaired.
[OAC 252:100-39-15(f)(3)]
- iv. The permittee shall maintain a leaking components monitoring log that identifies each component that is regulated under the requirements for this EUG.
[OAC 252:100-39-15(g)(1)]

- v. The permittee shall maintain records of operations as listed below. These records shall be maintained on-site or at a local field office for at least five years after the date of recording and shall be provided to regulatory personnel upon request.
[40 CFR §63.655, 40 CFR §60.486, and OAC 252:100-39-15]
1. The Notification of Compliance Status report required by § 63.182(c) of subpart H and the initial semiannual report required by § 60.487(b) of 40 CFR part 60, subpart VV shall be submitted within 150 days of the compliance date specified in Table 11 of 40 CFR part 63, Subpart CC. [40 CFR §63.655(d)(2)]
 2. A list of identification numbers for valves that are designated as leakless.
[40 CFR §63.655(d)(4)]
 3. Identification, either by list or location, of equipment in organic HAP service less than 300 hours per year within refining process units.
[40 CFR §63.655(d)(5)]
 4. When each leak is detected, a weatherproof and readily visible identification shall be attached to the leaking equipment. [40 CFR §60.486(b)]
 5. When each leak is detected, the following information shall be recorded in a log and shall be kept for 2 years in a readily accessible location:
[40 CFR §60.486(c)]
 - a. The instrument and operator identification numbers and the equipment identification number.
 - b. The date the leak was detected and the dates of each attempt to repair the leak.
 - c. Repair methods applied in each attempt to repair the leak.
 - d. "Above 10,000" if the maximum instrument reading measured by the methods specified in § 60.485(a) after each repair attempt is equal to or greater than 10,000 ppm.
 - e. "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.
 - f. The signature of the owner or operator (or designate) whose decision it was that repair could not be effected without a process shutdown.
 - g. The expected date of successful repair of the leak if a leak is not repaired within 15 days.
 - h. Dates of process unit shutdowns that occur while the equipment is unrepaired.
 - i. The date of successful repair of the leak.
 6. Detailed schematics, design specifications, and piping and instrumentation diagrams along with the dates and descriptions of any changes in the design specifications of closed vent systems and control devices.[40 CFR §60.486(d)]
 7. A list of identification numbers on equipment for pressure relief devices, vacuum service, and equipment that is operating in VOC service less than 300 hr/yr. Pressure relief devices require dates of each compliance test, background level measured, and the maximum instrument reading measured during each compliance test.
[40 CFR §60.486(e)]

8. Information (identification, unsafe-to-monitor, monitoring plan, etc.) pertaining to the valves and pumps shall be recorded in a log and kept in a readily accessible location. [40 CFR §60.486(f)]
 9. Information pertaining to the valves monitoring schedule and percent found leaking during each monitoring period shall be recorded in a log and kept in a readily accessible location. [40 CFR §60.486(g)]
 10. Information pertaining to design criterion and changes to this criterion shall be recorded. An analysis for design capacity, with a statement listing the feed or raw materials and products and an analysis demonstrating whether these chemicals are heavy liquids or beverage alcohol, and an analysis demonstrating that equipment is not in VOC service shall be recorded in a log that is kept in a readily accessible location. [40 CFR §60.486(h) & (i)]
 11. Information and data used to demonstrate that a piece of equipment is not in VOC service shall be recorded in a log that is kept in a readily accessible location. [40 CFR §60.486(j)]
 12. The owner or operator of a petroleum refinery shall maintain a leaking components monitoring log and shall be kept for 2 years and made accessible location upon request. The log shall contain, at a minimum, the following information: [OAC 252:100-39-15(g)]
 - a. The name of the process unit where the component is located.
 - b. The type of component (valve, seal, etc.).
 - c. The tag number of the component, if not repaired immediately on discovery.
 - d. Dates for which the leaking component was discovered and repaired.
 - e. The date and instrument reading of the recheck procedure after a leaking component is repaired.
 - f. The date of the calibration of the monitoring instrument which shall be made available for inspection on request.
 - g. Leaks that cannot be repaired until turnaround.
 - h. The total number of components checked and the total number of components found leaking.
- vi. The permittee shall submit a single report, so long as all reporting requirements for each regulation are included, to comply with the reporting requirements for this EUG. [40 CFR §63.655, 40 CFR §60.487, and OAC 252:100-39-15]
1. Semi-annual reports required by NESHAP Subpart CC or NSPS Subpart VVa may be submitted for two of the quarterly reports required by OAC 252:100-39-15.

j. Insignificant Activities

The permittee shall maintain records of total emissions from any source classified as Insignificant on the basis of its emissions (annual), as well as a description of the calculation method and data used in the calculation, to demonstrate the continued status of certain sources as Insignificant Activities.

3. Transport/delivery vessel requirements. In addition to the requirements contained in 252:100-39-41(d), facilities located in Tulsa County must meet the following requirements.
[OAC 252:100-39-41(e)(4)]

Terminal owners shall not allow filling of vessels that do not have a current (i.e., conducted within the last 12 months) certified pressure test on file that is consistent with EPA Test Method 27. Maintenance activities shall not occur when the vehicle is loading or unloading or is in a pressurized state.

4. No later than 30 days after each anniversary date of the issuance of the initial Title V operating permit (November 4, 2013), 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) & (D)]
5. The Permit Shield (Standard Conditions, Section VI) is extended to the following requirements that have been determined to be inapplicable to this facility.
[OAC 252-100-8-6(d)(2)]

OAC 252:100-7	Minor Facilities	not in source category
OAC 252:100-11	Alternative Emissions Reduction	not requested
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 Elevators	not in source category
OAC 252:100-47	Municipal Solid Waste Landfills	not in source category

6. This permit supersedes all previous Air Quality operating permits for this facility, which are now cancelled.
7. This facility is considered an existing Prevention of Significant Deterioration (PSD) facility. As such, the facility is subject to the provisions of OAC 252-8-36.2(c) for any project as defined therein.
[OAC 252:100-8-36.2(c)]

**MAJOR SOURCE AIR QUALITY PERMIT
STANDARD CONDITIONS
(September 15, 2025)**

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 CFR §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, and Annual Emission Inventory submitted in accordance with this permit shall be certified by a responsible official. Any Excess Emission Report submitted in accordance with this permit shall be certified by a responsible official or designee. This certification shall be signed by a responsible official (or designee, if allowed), 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 (NESHAP) 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 CFR §§60.7 and 63.10, 40 CFR Part 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 (PM₁₀). NSPS may allow reporting of only particulate matter emissions caught in the filter (obtained using Reference Method 5).

K. Unless required to be submitted to CEDRI by a specific regulation, the permittee shall submit to the AQD a copy of all reports submitted to the EPA as required by 40 CFR Parts 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. The term of an Initial Title V or Title V renewal operating permit shall be five years from the date of issuance. Modifications to a Title V or Title V renewal permit does not reset the five year term. The expiration date of all permit actions is specified on the Part 70 permit authorization page.
[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(17) 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. Qualification for consideration of mitigating factors 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 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 CFR 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 Part 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 Part 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 Part 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. 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]



NSR CONSTRUCTION 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. 2018-0593-C (M-9)

Holly Energy Partners Tulsa, LLC

having complied with the requirements of the law, is hereby granted permission to construct all sources within the boundaries of the Tulsa Refinery Tank Farm and Product Loading at 902 W. 25th St., Tulsa County, Oklahoma, subject to Standard Conditions dated June 21, 2016, and Specific Conditions, both attached.

In the absence of construction commencement, this permit shall expire 18 months from the issuance date, except as authorized under Section VIII of the Standard Conditions.

DRAFT/PROPOSED

Kendal Stegmann
Division Director

Date Issued

Brenda McLaury
Holly Energy Partners Tulsa, LLC
1700 S. Union Avenue
Tulsa, OK 74107

SUBJECT: Construction Permit No. **2018-0593-C (M-9)**
Holly Energy Partners Tulsa, LLC
Tulsa Refinery Tank Farm and Product Loading
Facility ID: 9701
Section 14, Township 19N, Range 12E, Tulsa County, Oklahoma

Dear Brenda McLaury:

Enclosed is the permit authorizing the construction of the facility referenced above. 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 through DEQ's electronic reporting system by April 1st of every year. Any questions concerning the 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 the permit writer at Elijah.Ecklund@deq.ok.gov or by phone at (918) 293-1622.

Sincerely,

DRAFT/PROPOSED

Phillip Fielder, P.E.
Chief Engineer
AIR QUALITY DIVISION

Enclosures: AQD Public Review Process
Sample Notice Form
AQD Acronym List

Brenda McLaury
Holly Energy Partners Tulsa, LLC
1700 S. Union Avenue
Tulsa, OK 74107

SUBJECT: Construction Permit No. **2018-0593-C (M-9)**
Holly Energy Partners Tulsa, LLC
Tulsa Refinery Tank Farm and Product Loading
Facility ID: 9701
Section 14, Township 19N, Range 12E, Tulsa County, Oklahoma

Dear Brenda McLaury:

Air Quality has received the permit application for the reference facility and completed initial review. This application has been determined to be a Tier II application. In accordance with 27A O.S. 2-14-301 and 302 and OAC 252:4-7-13(c), the enclosed draft permit is now ready for public review. The requirements for public review of the draft permit include the following steps, which **you** must accomplish:

1. Publish at least one legal notice (one day) in at least one newspaper of general circulation within the county where the facility is located (Instructions enclosed);
2. Submit sample notice and provide date of publication to **AQD 5 days prior to notice publishing;**
3. Provide for public review, for a period of 30 days following the date of the newspaper announcement, a copy of the application and draft permit at a convenient location (preferentially at a public location) within the county of the facility;
4. Send AQD a signed affidavit of publication for the notice(s) from Item #1 above within 20 days of publication of the draft permit. Any additional comments or requested changes you have for the draft permit or the application should be submitted within 30 days of publication.

Thank you for your cooperation. If you have any questions, please refer to the authorization number above and contact the permit writer at Elijah.Ecklund@deq.ok.gov, or at (918) 293-1622.

Sincerely,



Phillip Fielder, P.E.
Chief Engineer
AIR QUALITY DIVISION

NOTICE OF DRAFT PERMIT TIER II or TIER III AIR QUALITY PERMIT APPLICATION

APPLICANT RESPONSIBILITIES

Permit applicants are required to give public notice that a Tier II or Tier III draft permit has been prepared by DEQ. The notice must be published in one newspaper local to the site or facility. Note that if either the applicant or the public requests a public meeting, this must be arranged by the DEQ.

1. Complete the public notice using the samples provided by AQD below. Please use the version applicable to the requested permit action;
Version 1 – Traditional NSR process for a construction permit
Version 2 – Enhanced NSR process for a construction permit
Version 3 – initial Title V (Part 70 Source) operating permit, Title V operating permit renewal, Significant Modification to a Title V operating permit, and any Title V operating permit modification incorporating a construction permit that followed Traditional NSR process
2. Determine appropriate newspaper local to facility for publishing;
3. Submit sample notice and provide date of publication to AQD 5 days prior to notice publishing;
4. Upon publication, a signed affidavit of publication must be obtained from the newspaper and sent to AQD.

REQUIRED CONTENT (27A O.S. § 2-14-302 and OAC 252:4-7-13(c))

1. A statement that a Tier II or Tier III draft permit has been prepared by DEQ;
2. Name and address of the applicant;
3. Name, address, driving directions, legal description and county of the site or facility;
4. The type of permit or permit action being sought;
5. A description of activities to be regulated, including an estimate of emissions from the facility;
6. Location(s) where the application and draft permit may be reviewed (a location in the county where the site/facility is located must be included);
7. Name, address, and telephone number of the applicant and DEQ contacts;
8. Any additional information required by DEQ rules or deemed relevant by applicant;
9. A 30-day opportunity to request a formal public meeting on the draft permit.

SAMPLE NOTICES:

DEQ NOTICE OF TIER ...II or III... DRAFT PERMIT

A Tier ...II or III... application for an air quality construction permit for a modification at an existing major facility has been filed with the Oklahoma Department of Environmental Quality (DEQ) by applicant, ...name and address.

The applicant requests approval to ...brief description of purpose of application... at the ...site/facility name ... [proposed to be] located at ...physical address (if any), driving directions, and legal description including county....

In response to the application, DEQ has prepared a draft construction permit (Permit Number: ...xxxx-xxxx-x...), which may be reviewed at ...locations (one must be in the county where the site/facility is located)... or at the Air Quality Division's main office (see address below). The draft permit is also available for review under Permits for Public Review on the DEQ Web Page: <https://oklahoma.gov/deq.html>

This draft permit would authorize the facility to emit the following regulated pollutants: (list each pollutant and amounts in tons per year (TPY)), which represents (identify the emissions change (increase or decrease) involved in the modification). [Or add: The modification will not result in a change in emissions.] [For PSD permits only, add: The project will consume the following increment levels: (list the amount of increment consumption for each pollutant in ug/m³).]

The public comment period ends 30 days after the date of publication of this notice. Any person may submit written comments concerning the draft permit to the Air Quality Division contact listed below or as directed through the corresponding online notice. Only those issues relevant to the proposed modification(s) are open for comment. A public meeting on the draft permit may also be requested in writing at the same address. Note that all public meetings are to be arranged and conducted by DEQ staff.

In addition to the public comment opportunity offered under this notice, this draft permit is subject to U.S. Environmental Protection Agency (EPA) review, EPA objection, and petition to EPA, as provided by 40 CFR § 70.8. The requirements of the construction permit will be incorporated into the Title V operating permit through the administrative amendment process. Therefore, no additional opportunity to provide comments or EPA review, EPA objection, and petitions to EPA will be available to the public when requirements from the construction permit are incorporated into the Title V operating permit.

If the Administrator (EPA) does not object to the proposed permit, the public has 60 days following the Administrator's 45-day review period to petition the Administrator to make such an objection as provided in 40 CFR 70.8(d) and in OAC 252:100-8-8(j).

Information on all permit actions including draft permits, proposed permits, final issued permits and applicable review timelines are available in the Air Quality section of the DEQ Web page: <https://oklahoma.gov/deq.html>.

For additional information, contact ...names, addresses and telephone numbers of contact persons for the applicant, or contact DEQ at: Chief Engineer, Air Quality Division, 707 N. Robinson, Suite 4100, P.O. Box 1677, Oklahoma City, OK, 73101-1677. Phone No. (405) 702-4100.

Department of Environmental Quality (DEQ)
Air Quality Division (AQD)
Acronym List
9-8-2025

ACFM	Actual Cubic Feet per Minute	GACT	Generally Achievable Control Technology
AD	Applicability Determination	GAL	Gallon (gal)
AFRC	Air-to-Fuel Ratio Controller	GDF	Gasoline Dispensing Facility
API	American Petroleum Institute	GEP	Good Engineering Practice
ASTM	American Society for Testing and Materials	GHG	Greenhouse Gases
AVO	Audio, Visual, or Olfactory	GR	Grain(s) (gr)
BACT	Best Available Control Technology	H₂CO	Formaldehyde
BAE	Baseline Actual Emissions	H₂S	Hydrogen Sulfide
BBL	Barrel(s)	HAP	Hazardous Air Pollutants
BHP	Brake Horsepower (bhp)	HC	Hydrocarbon
BTEX	Benzene, Toluene, Ethylbenzene, Xylene	HCFC	Hydrochlorofluorocarbon
BTU	British thermal unit (Btu)	HFR	Horizontal Fixed Roof
C&E	Compliance and Enforcement	HON	Hazardous Organic NESHAP
CAA	Clean Air Act	HP	Horsepower (hp)
CAM	Compliance Assurance Monitoring	HR	Hour (hr)
CAS	Chemical Abstract Service	I&M	Inspection and Maintenance
CAAA	Clean Air Act Amendments	IBR	Incorporation by Reference
CC	Catalytic Converter	ICE	Internal Combustion Engine
CCR	Continuous Catalyst Regeneration	LAER	Lowest Achievable Emission Rate
CD	Consent Decree	LB	Pound(s) [Mass] (lb, lbs, lbm)
CEM	Continuous Emission Monitor	LB/HR	Pound(s) per Hour (lb/hr)
CFC	Chlorofluorocarbon	LDAR	Leak Detection and Repair
CFR	Code of Federal Regulations	LNG	Liquefied Natural Gas
CI	Compression Ignition	LT	Long Ton(s) (metric)
CNG	Compressed Natural Gas	LTPD	Long Tons per Day
CO	Carbon Monoxide or Consent Order	LPE	Legally and Practicably Enforceable
COA	Capable of Accommodating	M	Thousand (Roman Numeral)
COM	Continuous Opacity Monitor	MAAC	Maximum Acceptable Ambient Concentration
D	Day	MACT	Maximum Achievable Control Technology
DEF	Diesel Exhaust Fluid	MM	Prefix used for Million (Thousand-Thousand)
DG	Demand Growth	MMBTU	Million British Thermal Units (MMBtu)
DSCF	Dry Standard (At Standard Conditions) Cubic Foot (Feet)	MMBTUH	Million British Thermal Units per Hour (MMBtu/hr)
EGU	Electric Generating Unit	MMSCF	Million Standard Cubic Feet (MMscf)
EI	Emissions Inventory	MMSCFD	Million Standard Cubic Feet per Day
EPA	Environmental Protection Agency	MSDS	Material Safety Data Sheet
ESP	Electrostatic Precipitator	MWC	Municipal Waste Combustor
EUG	Emissions Unit Group	MWe	Megawatt Electrical
EUSGU	Electric Utility Steam Generating Unit	NA	Nonattainment
FCE	Full Compliance Evaluation	NAAQS	National Ambient Air Quality Standards
FCCU	Fluid Catalytic Cracking Unit	NAICS	North American Industry Classification System
FEL	Federally Enforceable Limit(s)	NESHAP	National Emission Standards for Hazardous Air Pollutants
FESOP	Federally Enforceable State Operating Permit	NH₃	Ammonia
FIP	Federal Implementation Plan	NMHC	Non-methane Hydrocarbon
FR	Federal Register	NGL	Natural Gas Liquids

NO₂	Nitrogen Dioxide	SCR	Selective Catalytic Reduction
NO_x	Nitrogen Oxides	SEP	Supplemental Environmental Project
NOI	Notice of Intent	SER	Significant Emission Rate
NSCR	Non-Selective Catalytic Reduction	SI	Spark Ignition
NSPS	New Source Performance Standards	SIC	Standard Industrial Classification
NSR	New Source Review	SIP	State Implementation Plan
		SNCR	Selective Non-Catalytic Reduction
O₃	Ozone	SO₂	Sulfur Dioxide
O&G	Oil and Gas	SO_x	Sulfur Oxides
O&M	Operation and Maintenance	SOP	Standard Operating Procedure
O&NG	Oil and Natural Gas	SRU	Sulfur Recovery Unit
OAC	Oklahoma Administrative Code		
OC	Oxidation Catalyst	T	Tons
OGI	Optical Gas Imaging	TAC	Toxic Air Contaminant
		TEG	Triethylene Glycol
PAH	Polycyclic Aromatic Hydrocarbons	THC	Total Hydrocarbons
PAE	Projected Actual Emissions	TPY	Tons per Year
PAL	Plant-wide Applicability Limit	TRS	Total Reduced Sulfur
Pb	Lead	TSP	Total Suspended Particulates
PBR	Permit by Rule	TV	Title V of the Federal Clean Air Act
PCB	Polychlorinated Biphenyls		
PCE	Partial Compliance Evaluation	µg/m³	Micrograms per Cubic Meter
PEA	Portable Emissions Analyzer	US EPA	U. S. Environmental Protection Agency
PFAS	Per- and Polyfluoroalkyl Substance		
PM	Particulate Matter	VFR	Vertical Fixed Roof
PM_{2.5}	Particulate Matter with an Aerodynamic Diameter <= 2.5 Micrometers	VMT	Vehicle Miles Traveled
PM₁₀	Particulate Matter with an Aerodynamic Diameter <= 10 Micrometers	VOC	Volatile Organic Compound
POM	Particulate Organic Matter or Polycyclic Organic Matter	VOL	Volatile Organic Liquid
ppb	Parts per Billion	VRT	Vapor Recovery Tower
ppm	Parts per Million	VRU	Vapor Recovery Unit
ppmv	Parts per Million Volume		
ppmvd	Parts per Million Dry Volume	YR	Year
PSD	Prevention of Significant Deterioration	2SLB	2-Stroke Lean Burn
psi	Pounds per Square Inch	4SLB	4-Stroke Lean Burn
psia	Pounds per Square Inch Absolute	4SRB	4-Stroke Rich Burn
psig	Pounds per Square Inch Gage		
RACT	Reasonably Available Control Technology		
RATA	Relative Accuracy Test Audit		
RAP	Regulated Air Pollutant or Reclaimed Asphalt Pavement		
RFG	Refinery Fuel Gas		
RICE	Reciprocating Internal Combustion Engine		
RO	Responsible Official		
ROAT	Regional Office at Tulsa		
RVP	Reid Vapor Pressure		
SCC	Source Classification Code		
SCF	Standard Cubic Foot		
SCFD	Standard Cubic Feet per Day		
SCFM	Standard Cubic Feet per Minute		

Date: September 19, 2025

Cherokee Nation
Attn: Chuck Hoskin, Jr., Principal Chief
P.O. Box 918
Tahlequah, OK 74465

Re: Permit Application No. 2018-0593-C (M-9)
Holly Energy Partners Tulsa, LLC, Tulsa Refinery Tank Farm and Product Loading (FAC ID: 9701)
Section 13, Township 19N, Range 12E, (36.12599, -96.00158), Tulsa County
Date Received: January 2, 2025

Dear Chuck Hoskin, Jr.:

The Oklahoma Department of Environmental Quality (ODEQ), Air Quality Division (AQD), has received the Tier II/Tier III application referenced above. A Tier II/III application requires the facility provide a 30-day public comment period on the draft Tier II/III permit and a 20-day public comment period on a proposed Tier III permit at a public location within the county of the facility. The process requires the facility to notify the public by newspaper notice in a newspaper in the county of the proposed project. Since the proposed project falls within your Tribal jurisdiction, AQD is providing this direct notice. This letter notification is in addition to the newspaper notice.

Copies of draft permits and comment opportunities are also provided to the public on the ODEQ website at the following location:

<https://www.deq.ok.gov/air-quality-division/air-permits/public-participation-issued-permits/>

If you prefer a copy of the draft and/or proposed permit, or direct notification by letter for any remaining public comment opportunities, if applicable, on the referenced permit action, please notify me by e-mail at phillip.felder@deq.ok.gov, or by letter at:

Department of Environmental Quality, Air Quality Division
Attn: Phillip Fielder, Chief Engineer
707 N Robinson
Oklahoma City, OK, 73102

Thank you for your cooperation. If you have any questions, I can also be contacted at (405) 702-4185.

Sincerely,



Phillip Fielder, P.E., Chief Engineer
AIR QUALITY DIVISION

Date: September 19, 2025

Muscogee Nation
Attn: David Hill, Principal Chief
P.O. Box 580
Okmulgee, OK 74447

Re: Permit Application No. 2018-0593-C (M-9)
Holly Energy Partners Tulsa, LLC, Tulsa Refinery Tank Farm and Product Loading (FAC ID: 9701)
Section 13, Township 19N, Range 12E, (36.12599, -96.00158)
Tulsa County
Date Received: January 2, 2025

Dear David Hill:

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<https://www.deq.ok.gov/air-quality-division/air-permits/public-participation-issued-permits/>

If you prefer a copy of the draft and/or proposed permit, or direct notification by letter for any remaining public comment opportunities, if applicable, on the referenced permit action, please notify me by e-mail at phillip.felder@deq.ok.gov, or by letter at:

Department of Environmental Quality, Air Quality Division
Attn: Phillip Fielder, Chief Engineer
707 N Robinson
Oklahoma City, OK, 73102

Thank you for your cooperation. If you have any questions, I can also be contacted at (405) 702-4185.

Sincerely,



Phillip Fielder, P.E., Chief Engineer
AIR QUALITY DIVISION