



Ergon - West Virginia, Inc.

9995 Ohio River Blvd, Post Office Box 356
Newell, West Virginia 26050-0356

April 30, 2018

Bev McKeone, NSR Program Manager
West Virginia Division of Environmental Protection
601-57th Street, SE
Charleston, WV 25304

Tracking Number: 1ZX83W680196534526

**RE: Ergon-West Virginia Inc. Newell Refinery
Construction and Modification Permit Application**

Dear Ms. McKeone:

Ergon-West Virginia Inc. (EWVI) owns and operates a petroleum refinery (Newell Refinery) that processes crude oil into fuels and other specialty oil and wax products through the use of distillation and chemical reaction processes. The facility is located at 9995 Ohio River Blvd. in Newell, Hancock County, West Virginia. The facility currently operates under West Virginia Department of Environmental Protection (WV DEP) Regulation 13 Permit No. R13-2334AA and Title V Permit No. R30-02900008-2015 as most recently modified on June 5, 2017.

Current Project – Gasoline Tanks

EWVI is submitting the enclosed Construction and Modification Permit Application for the installation of a new gasoline storage tank, a new ethanol storage tank, and modifications to three existing gasoline tanks as well as an increase in throughput for the gasoline/ethanol tank group. The tank throughputs in this application are based on an annual average gasoline tank group throughput of 318,034,433 gallons per year.

Current Project –Feedstock Tank

EWVI is also submitting the enclosed Construction and Modification Permit Application for the installation of a new feedstock tank. The installation of the feedstock tank is not associated with the changes at the gasoline storage tanks, but due to the project timing is included as a part of a single R13 application. The new feedstock tank will allow for the purchase of a new type of feed to replace declining availability of current crude stock. The total charge rate to the refinery will not be increased as a result of this project.

Clarification of Throughput Rates

Through the preparation of this application EWVI discovered a terminology error in the August 2015 Platformer application regarding the equipment operating rate. As shown on the process flow diagram with that application, the naphtha is processed first in the unifier then the naphtha splitter/platformer. The permit included the following statement:

“EWVI proposes to increase the platformer's capacity from 3,900 barrels per day (bpd) to 7,500 bpd.”

The statement should have read as follows:

“EWVI proposes to increase the platformer's capacity from 3,900 barrels per day (bpd) to 4,820 bpd.”

There is no language in the permit itself that needs updated related to this clarification of throughput; however, EWVI is providing this information as a technical correction to information in a historical permit application.

Suggested Permit Language and Clean-Up Items

EWVI has also attached suggested language for both the R13 permit as well as the modified Title V permit for the new and modified tanks. Additionally, EWVI has included some "cleanup" suggested language for the permits as well further clarifying which tanks are subject to 40 CFR 60, Subparts K/Ka/Kb:

- The following tanks commenced construction prior to the applicability dates of 40 CFR 60, Subpart K/Ka/Kb and have not been 'modified' as that term is defined in 40 CFR 60, Subpart A: TK-4001, 4014, 4015, 4018, 4041, 4052, and 4053.
- The following tanks are potentially subject to 40 CFR 60, Subpart Kb based on the commence construction date and capacity; however, these tanks are exempt based on the vapor pressure of the material stored: TK-4047 and 4051.

Tanks TK-4012 and TK-4013 will not be modified. However, we do note a permit cleanup item related to these two tanks. The emissions unit table in Section 1.0 of the permit shows the tanks to be equipped with mechanical shoe type seals. The floating roof tanks are actually equipped with vapor mounted seal systems. We request the emissions unit table be updated to reflect the vapor mounted seal design.

EWVI also notes two permit cleanup items in Section 5 of the permit related to the main flare. An explanation of the requested changes can be found in Attachments U and V of the application package.

~~~~~

The application package contains the required application forms and support material. As required, the application is filed with one hard copy and two CDs with the associated application fee of \$2,000 (\$1,000 40 CSR 13 Application fee plus \$1,000 NSPS Requirements fee) in the form of a check.

If you have any questions or comments about the attached information or have additional information requirements, please contact me at (304) 387-7046 or Jack.Azar@ergon.com.

Sincerely,

  
Jack Azar  
ESHT Manager

cc: Jake Neihaus—Corporate  
Katelan Crain—Corporate



## R13 PERMIT APPLICATION

 **Ergon - West Virginia, Inc.**

**Ergon West Virginia, Inc.**

**Newell Refinery**

Prepared By:

**TRINITY CONSULTANTS**  
4500 Brooktree Road  
Suite 103  
Wexford, PA 15090  
(724) 935-2611

April 2018

**Trinity**   
**Consultants**

*EHS Solutions Delivered Uncommonly Well*

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WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
**DIVISION OF AIR QUALITY**

601 57<sup>th</sup> Street, SE  
Charleston, WV 25304  
(304) 926-0475  
[www.dep.wv.gov/daq](http://www.dep.wv.gov/daq)

**APPLICATION FOR NSR PERMIT  
AND  
TITLE V PERMIT REVISION  
(OPTIONAL)**

PLEASE CHECK ALL THAT APPLY TO **NSR (45CSR13)** (IF KNOWN):

- CONSTRUCTION**     **MODIFICATION**     **RELOCATION**  
 **CLASS I ADMINISTRATIVE UPDATE**     **TEMPORARY**  
 **CLASS II ADMINISTRATIVE UPDATE**     **AFTER-THE-FACT**

PLEASE CHECK TYPE OF **45CSR30 (TITLE V)** REVISION (IF ANY):

- ADMINISTRATIVE AMENDMENT**     **MINOR MODIFICATION**  
 **SIGNIFICANT MODIFICATION**

IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS **ATTACHMENT S** TO THIS APPLICATION

**FOR TITLE V FACILITIES ONLY: Please refer to "Title V Revision Guidance" in order to determine your Title V Revision options (Appendix A, "Title V Permit Revision Flowchart") and ability to operate with the changes requested in this Permit Application.**

**Section I. General**

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |  |                                                                                                                                                                               |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| 1. Name of applicant (as registered with the WV Secretary of State's Office):<br>Ergon-West Virginia, Inc. (EWVI)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  | 2. Federal Employer ID No. (FEIN):<br>721375114                                                                                                                               |  |
| 3. Name of facility (if different from above):<br>Newell Refinery                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  | 4. The applicant is the:<br><input type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input checked="" type="checkbox"/> BOTH                                         |  |
| 5A. Applicant's mailing address:<br><br>9995 Ohio River Blvd, Route 2 South<br>Newell, WV 26050                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |  | 5B. Facility's present physical address:<br><br>9995 Ohio River Blvd, Route 2 South<br>Newell, WV 26050                                                                       |  |
| 6. <b>West Virginia Business Registration.</b> Is the applicant a resident of the State of West Virginia? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO<br>– If YES, provide a copy of the <b>Certificate of Incorporation/Organization/Limited Partnership</b> (one page) including any name change amendments or other Business Registration Certificate as <b>Attachment A</b> .<br>– If NO, provide a copy of the <b>Certificate of Authority/Authority of L.L.C./Registration</b> (one page) including any name change amendments or other Business Certificate as <b>Attachment A</b> . |  |                                                                                                                                                                               |  |
| 7. If applicant is a subsidiary corporation, please provide the name of parent corporation:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |                                                                                                                                                                               |  |
| 8. Does the applicant own, lease, have an option to buy or otherwise have control of the <i>proposed site</i> ? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO<br>– If YES, please explain:        This is an existing site owned by Ergon – West Virginia, Inc.<br><br>– If NO, you are not eligible for a permit for this source.                                                                                                                                                                                                                                                            |  |                                                                                                                                                                               |  |
| 9. Type of plant or facility (stationary source) to be <b>constructed, modified, relocated, administratively updated</b> or <b>temporarily permitted</b> (e.g., coal preparation plant, primary crusher, etc.): The facility is a petroleum refinery that is proposing to construct one (1) 30,000 bbl gasoline tank and one (1) 15,000 bbl ethanol tank. Additionally, this application also seeks to modify three (3) existing 30,000 bbl gasoline tanks.                                                                                                                                                         |  | 10. North American Industry Classification System (NAICS) code for the facility:<br><br>324110                                                                                |  |
| 11A. DAQ Plant ID No. (for existing facilities only):<br>029 – 00008                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |  | 11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only):<br>R13-2334AA and R30-02900008-2015 MM02/MM03 |  |

**All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.**

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                      |                                                                          |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|--------------------------------------------------------------------------|
| <p>12A.</p> <ul style="list-style-type: none"> <li>For <b>Modifications, Administrative Updates or Temporary permits</b> at an existing facility, please provide directions to the <i>present location</i> of the facility from the nearest state road;</li> <li>For <b>Construction or Relocation permits</b>, please provide directions to the <i>proposed new site location</i> from the nearest state road. Include a <b>MAP as Attachment B</b>.</li> </ul> <p>Two (2) miles south of Newel, WV on State Route 2.</p> |                                      |                                                                          |
| 12.B. New site address (if applicable):<br>N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 12C. Nearest city or town:<br>Newell | 12D. County:<br>Hancock                                                  |
| 12.E. UTM Northing (KM): 4495.1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 12F. UTM Easting (KM): 531.0         | 12G. UTM Zone: 17                                                        |
| <p>13. Briefly describe the proposed change(s) at the facility:<br/>EWVI is proposing to install three tanks: one (1) 30,000 bbl gasoline tank, one (1) 15,000 bbl ethanol tank, and one (1) CDU feed tank. Additionally, EWVI is seeking to modify three (3) existing 30,000 bbl gasoline tanks.</p>                                                                                                                                                                                                                      |                                      |                                                                          |
| <p>14A. Provide the date of anticipated installation or change: 04/01/2018</p> <ul style="list-style-type: none"> <li>If this is an <b>After-The-Fact</b> permit application, provide the date upon which the proposed change did happen:        /        /</li> </ul>                                                                                                                                                                                                                                                     |                                      | <p>14B. Date of anticipated Start-Up if a permit is granted:<br/>TBD</p> |
| <p>14C. Provide a <b>Schedule</b> of the planned <b>Installation of/Change</b> to and <b>Start-Up</b> of each of the units proposed in this permit application as <b>Attachment C</b> (if more than one unit is involved).</p>                                                                                                                                                                                                                                                                                             |                                      |                                                                          |
| <p>15. Provide maximum projected <b>Operating Schedule</b> of activity/activities outlined in this application:<br/> Hours Per Day 24        Days Per Week 7        Weeks Per Year 52</p>                                                                                                                                                                                                                                                                                                                                  |                                      |                                                                          |
| <p>16. Is demolition or physical renovation at an existing facility involved?    <input checked="" type="checkbox"/> <b>YES</b>        <input type="checkbox"/> <b>NO</b></p>                                                                                                                                                                                                                                                                                                                                              |                                      |                                                                          |
| <p>17. <b>Risk Management Plans.</b> If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see <a href="http://www.epa.gov/ceppo">www.epa.gov/ceppo</a>), submit your <b>Risk Management Plan (RMP)</b> to U. S. EPA Region III.</p>                                                                                                                                                                                                              |                                      |                                                                          |
| <p>18. <b>Regulatory Discussion.</b> List all Federal and State air pollution control regulations that you believe are applicable to the proposed process (<i>if known</i>). A list of possible applicable requirements is also included in Attachment S of this application (Title V Permit Revision Information). Discuss applicability and proposed demonstration(s) of compliance (<i>if known</i>). Provide this information as <b>Attachment D</b>.</p>                                                              |                                      |                                                                          |
| <p><b>Section II. Additional attachments and supporting documents.</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                      |                                                                          |
| <p>19. Include a check payable to WVDEP – Division of Air Quality with the appropriate <b>application fee</b> (per 45CSR22 and 45CSR13).</p>                                                                                                                                                                                                                                                                                                                                                                               |                                      |                                                                          |
| <p>20. Include a <b>Table of Contents</b> as the first page of your application package.</p>                                                                                                                                                                                                                                                                                                                                                                                                                               |                                      |                                                                          |
| <p>21. Provide a <b>Plot Plan</b>, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is or is to be located as <b>Attachment E</b> (Refer to <b>Plot Plan Guidance</b>) .</p> <ul style="list-style-type: none"> <li>Indicate the location of the nearest occupied structure (e.g. church, school, business, residence).</li> </ul>                                                                                                                              |                                      |                                                                          |
| <p>22. Provide a <b>Detailed Process Flow Diagram(s)</b> showing each proposed or modified emissions unit, emission point and control device as <b>Attachment F</b>.</p>                                                                                                                                                                                                                                                                                                                                                   |                                      |                                                                          |
| <p>23. Provide a <b>Process Description</b> as <b>Attachment G</b>.</p> <ul style="list-style-type: none"> <li>Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable).</li> </ul> <p><i>All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.</i></p>                                                                                                           |                                      |                                                                          |
| <p>24. Provide <b>Material Safety Data Sheets (MSDS)</b> for all materials processed, used or produced as <b>Attachment H</b>.</p> <ul style="list-style-type: none"> <li>For chemical processes, provide a MSDS for each compound emitted to the air.</li> </ul>                                                                                                                                                                                                                                                          |                                      |                                                                          |
| <p>25. Fill out the <b>Emission Units Table</b> and provide it as <b>Attachment I</b>.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                      |                                                                          |
| <p>26. Fill out the <b>Emission Points Data Summary Sheet (Table 1 and Table 2)</b> and provide it as <b>Attachment J</b>.</p>                                                                                                                                                                                                                                                                                                                                                                                             |                                      |                                                                          |

27. Fill out the **Fugitive Emissions Data Summary Sheet** and provide it as **Attachment K**.

28. Check all applicable **Emissions Unit Data Sheets** listed below:

|                                                          |                                                  |                                                                                  |
|----------------------------------------------------------|--------------------------------------------------|----------------------------------------------------------------------------------|
| <input type="checkbox"/> Bulk Liquid Transfer Operations | <input type="checkbox"/> Haul Road Emissions     | <input type="checkbox"/> Quarry                                                  |
| <input type="checkbox"/> Chemical Processes              | <input type="checkbox"/> Hot Mix Asphalt Plant   | <input type="checkbox"/> Solid Materials Sizing, Handling and Storage Facilities |
| <input type="checkbox"/> Concrete Batch Plant            | <input type="checkbox"/> Incinerator             | <input checked="" type="checkbox"/> Storage Tanks                                |
| <input type="checkbox"/> Grey Iron and Steel Foundry     | <input type="checkbox"/> Indirect Heat Exchanger |                                                                                  |
| <input type="checkbox"/> General Emission Unit, specify  |                                                  |                                                                                  |

Fill out and provide the **Emissions Unit Data Sheet(s)** as **Attachment L**.

29. Check all applicable **Air Pollution Control Device Sheets** listed below:

|                                             |                                                     |                                                |
|---------------------------------------------|-----------------------------------------------------|------------------------------------------------|
| <input type="checkbox"/> Absorption Systems | <input type="checkbox"/> Baghouse                   | <input type="checkbox"/> Flare                 |
| <input type="checkbox"/> Adsorption Systems | <input type="checkbox"/> Condenser                  | <input type="checkbox"/> Mechanical Collector  |
| <input type="checkbox"/> Afterburner        | <input type="checkbox"/> Electrostatic Precipitator | <input type="checkbox"/> Wet Collecting System |

Other Collectors, specify

Fill out and provide the **Air Pollution Control Device Sheet(s)** as **Attachment M**.

30. Provide all **Supporting Emissions Calculations** as **Attachment N**, or attach the calculations directly to the forms listed in Items 28 through 31.

31. **Monitoring, Recordkeeping, Reporting and Testing Plans.** Attach proposed monitoring, recordkeeping, reporting and testing plans in order to demonstrate compliance with the proposed emissions limits and operating parameters in this permit application. Provide this information as **Attachment O**.

➤ Please be aware that all permits must be practically enforceable whether or not the applicant chooses to propose such measures. Additionally, the DAQ may not be able to accept all measures proposed by the applicant. If none of these plans are proposed by the applicant, DAQ will develop such plans and include them in the permit.

32. **Public Notice.** At the time that the application is submitted, place a **Class I Legal Advertisement** in a newspaper of general circulation in the area where the source is or will be located (See 45CSR§13-8.3 through 45CSR§13-8.5 and **Example Legal Advertisement** for details). Please submit the **Affidavit of Publication** as **Attachment P** immediately upon receipt.

33. **Business Confidentiality Claims.** Does this application include confidential information (per 45CSR31)?

YES     NO

➤ If **YES**, identify each segment of information on each page that is submitted as confidential and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's "**Precautionary Notice – Claims of Confidentiality**" guidance found in the **General Instructions** as **Attachment Q**.

**Section III. Certification of Information**

34. **Authority/Delegation of Authority.** Only required when someone other than the responsible official signs the application. Check applicable **Authority Form** below:

|                                                                            |                                                           |
|----------------------------------------------------------------------------|-----------------------------------------------------------|
| <input type="checkbox"/> Authority of Corporation or Other Business Entity | <input type="checkbox"/> Authority of Partnership         |
| <input type="checkbox"/> Authority of Governmental Agency                  | <input type="checkbox"/> Authority of Limited Partnership |

Submit completed and signed **Authority Form** as **Attachment R**.

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*

35A. **Certification of Information.** To certify this permit application, a Responsible Official (per 45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

**Certification of Truth, Accuracy, and Completeness**

I, the undersigned  **Responsible Official** /  **Authorized Representative**, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

**Compliance Certification**

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

SIGNATURE \_\_\_\_\_

*Neil Stanton*  
(Please use blue ink)

DATE: \_\_\_\_\_

*4/30/18*  
(Please use blue ink)

35B. Printed name of signee: Neil Stanton

35C. Title: Vice President - Refining

35D. E-mail: [neil.stanton@ergon.com](mailto:neil.stanton@ergon.com)

36E. Phone: 304-387-7046

36F. FAX:

36A. Printed name of contact person (if different from above): Jack Azar

36B. Title: ESHT Manager

36C. E-mail: [Jack.Azar@ergon.com](mailto:Jack.Azar@ergon.com)

36D. Phone: 304-387-7046

36E. FAX:

**PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:**

- |                                                                                      |                                                                                                    |
|--------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> Attachment A: Business Certificate               | <input type="checkbox"/> Attachment K: Fugitive Emissions Data Summary Sheet                       |
| <input checked="" type="checkbox"/> Attachment B: Map(s)                             | <input checked="" type="checkbox"/> Attachment L: Emissions Unit Data Sheet(s)                     |
| <input checked="" type="checkbox"/> Attachment C: Installation and Start Up Schedule | <input type="checkbox"/> Attachment M: Air Pollution Control Device Sheet(s)                       |
| <input checked="" type="checkbox"/> Attachment D: Regulatory Discussion              | <input checked="" type="checkbox"/> Attachment N: Supporting Emissions Calculations                |
| <input checked="" type="checkbox"/> Attachment E: Plot Plan                          | <input checked="" type="checkbox"/> Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans |
| <input checked="" type="checkbox"/> Attachment F: Detailed Process Flow Diagram(s)   | <input checked="" type="checkbox"/> Attachment P: Public Notice                                    |
| <input checked="" type="checkbox"/> Attachment G: Process Description                | <input type="checkbox"/> Attachment Q: Business Confidential Claims                                |
| <input checked="" type="checkbox"/> Attachment H: Material Safety Data Sheets (MSDS) | <input type="checkbox"/> Attachment R: Authority Forms                                             |
| <input checked="" type="checkbox"/> Attachment I: Emission Units Table               | <input checked="" type="checkbox"/> Attachment S: Title V Permit Revision Information              |
| <input checked="" type="checkbox"/> Attachment J: Emission Points Data Summary Sheet | <input checked="" type="checkbox"/> Application Fee                                                |

*Please mail an original and three (3) copies of the complete permit application with the signature(s) to the DAQ, Permitting Section, at the address listed on the first page of this application. Please DO NOT fax permit applications.*

**FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE:**

- Forward 1 copy of the application to the Title V Permitting Group and:
- For Title V Administrative Amendments:
  - NSR permit writer should notify Title V permit writer of draft permit,
- For Title V Minor Modifications:
  - Title V permit writer should send appropriate notification to EPA and affected states within 5 days of receipt,
  - NSR permit writer should notify Title V permit writer of draft permit.
- For Title V Significant Modifications processed in parallel with NSR Permit revision:
  - NSR permit writer should notify a Title V permit writer of draft permit,
  - Public notice should reference both 45CSR13 and Title V permits,
  - EPA has 45 day review period of a draft permit.

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*



## ATTACHMENT A - BUSINESS CERTIFICATE

---

**WEST VIRGINIA  
STATE TAX DEPARTMENT  
BUSINESS REGISTRATION  
CERTIFICATE**

**ISSUED TO:  
ERGON-WEST VIRGINIA INC  
9995 OHIO RIVER BLVD  
NEWELL, WV 26050-1195**

**BUSINESS REGISTRATION ACCOUNT NUMBER: 1050-8935**

**This certificate is issued on: 06/11/2010**

*This certificate is issued by  
the West Virginia State Tax Commissioner  
in accordance with W.Va. Code § 11-12.*

*The person or organization identified on this certificate is registered  
to conduct business in the State of West Virginia at the location above.*

**This certificate is not transferrable and must be displayed at the location for which issued.**

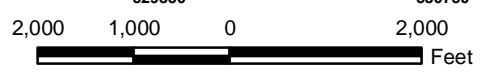
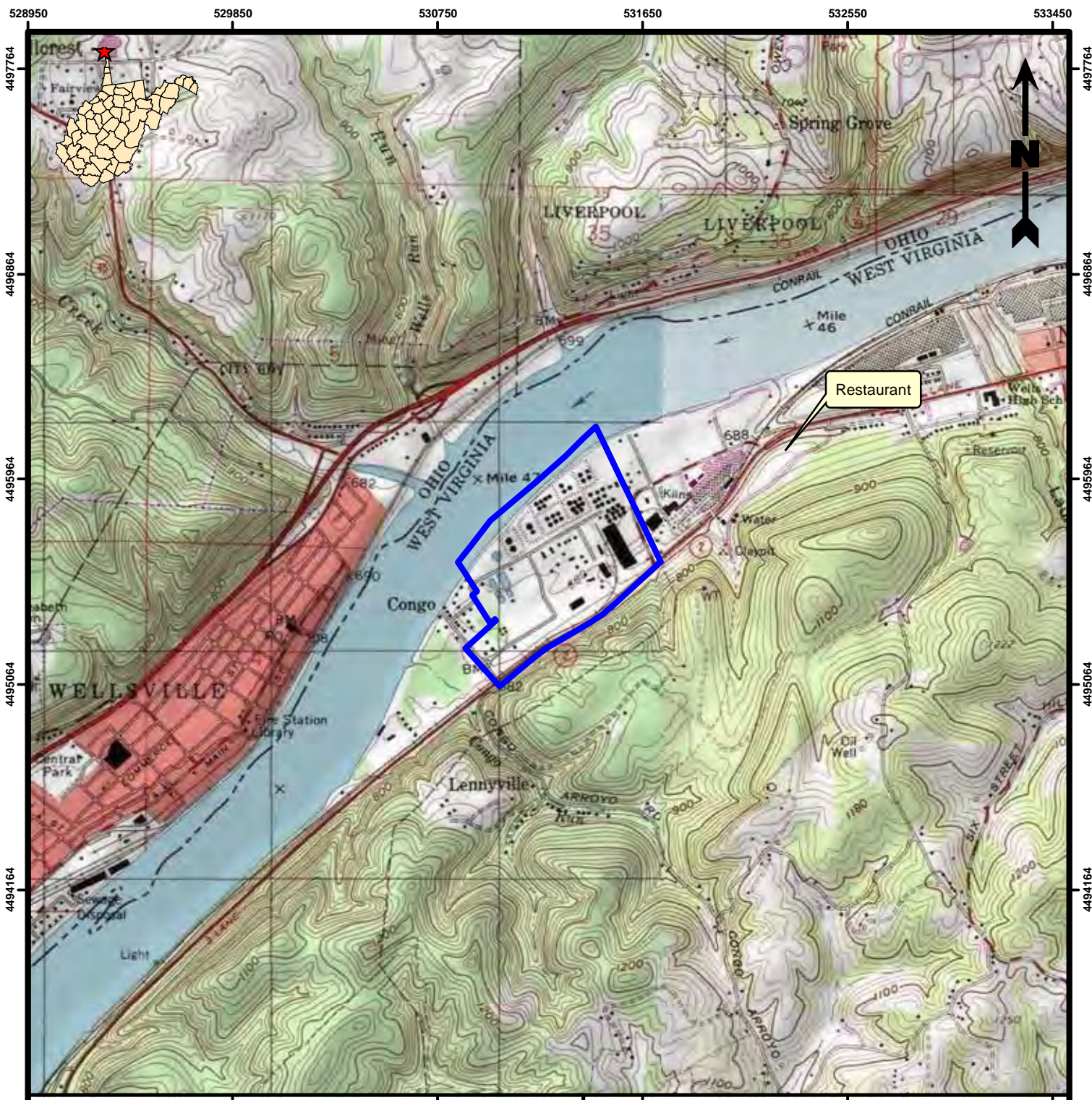
**This certificate shall be permanent until cessation of the business for which the certificate of registration was granted or until it is suspended, revoked or cancelled by the Tax Commissioner.**

**Change in name or change of location shall be considered a cessation of the business and a new certificate shall be required.**


**TRAVELING/STREET VENDORS: Must carry a copy of this certificate in every vehicle operated by them.  
CONTRACTORS, DRILLING OPERATORS, TIMBER/LOGGING OPERATIONS: Must have a copy of  
this certificate displayed at every job site within West Virginia.**

ATTACHMENT B - MAPS

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**Legend**

 Property Boundary

**Reference**

Base map comprised of U.S.G.S. 7.5 minute topographic maps, "East Liverpool North, WV", "East Liverpool South, WV", "Westville, WV", and "West Point, OH".

**Site Location Map**

**Title V Renewal Application**  
Newell, Hancock County, West Virginia

**Ergon-West Virginia, Inc**  
Newell Refinery



|             |     |          |
|-------------|-----|----------|
| Drawn By    | LMM | 07/16/14 |
| Checked By  | LMH | 07/16/14 |
| Approved By | JDA | 07/16/14 |

|                |                        |
|----------------|------------------------|
| Project Number | <b>B</b><br>Attachment |
| 098-057        |                        |
| Drawing Number |                        |
| 098-057-A001   |                        |

## ATTACHMENT C - PROJECT SCHEDULE

---

**ATTACHMENT C - SCHEDULE OF PLANNED INSTALLATION AND START-UP**

| <b>Unit</b>                      | <b>Construction/Modification Schedule</b> | <b>Startup Schedule</b> |
|----------------------------------|-------------------------------------------|-------------------------|
| Modified Gasoline Tank (TK-4004) | Upon issuance of permit                   | Summer 2018             |
| Modified Gasoline Tank (TK-4005) | Upon issuance of permit                   | Summer 2018             |
| Modified Gasoline Tank (TK-4006) | Upon issuance of permit                   | Summer 2018             |
| New Ethanol Tank (TK-4070)       | Upon issuance of permit                   | Summer 2018             |
| New Gasoline Tank (TK-4071)      | Upon issuance of permit                   | Summer 2018             |
| New Feedstock Tank (TK-4072)     | Upon issuance of permit                   | Summer 2018             |

## ATTACHMENT D - REGULATORY DISCUSSION

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## ATTACHMENT D - REGULATORY APPLICABILITY

This section documents the applicability determinations made for Federal and State air quality regulations. The monitoring, recordkeeping, reporting, and testing plan is presented in Attachment O. In this section, applicability or non-applicability of the following regulatory programs is addressed:

- > Prevention of Significant Deterioration (PSD) and/or Nonattainment New Source Review programs (NNSR);
- > Title V of the 1990 Clean Air Act Amendments;
- > New Source Performance Standards (NSPS);
- > National Emission Standards for Hazardous Air Pollutants (NESHAP); and
- > West Virginia State Implementation Plan (SIP) regulations.

This review is presented to supplement and/or add clarification to the information provided in the WVDEP R13 permit application forms. In addition to providing a summary of applicable requirements related to this project, this section of the application also provides non-applicability determinations for certain regulations, allowing the WVDEP to confirm that identified regulations are not applicable to the proposed sources or proposed modifications at the Newell Refinery. Note that explanations of non-applicability are limited to those regulations for which there may be some question of applicability specific to the operations at the Newell Refinery. Regulations that are categorically non-applicable are not discussed.

Table D-1 below shows the increase in allowable emissions as a result of the project for the storage tanks as well as the downstream loading operations.

**Table D-1: Increase in Allowable Emissions**

| <b>Pollutant</b>  | <b>Increased Emissions Rate (TPY)</b> |
|-------------------|---------------------------------------|
| CO                | 0.43                                  |
| NO <sub>x</sub>   | 0.09                                  |
| PM <sub>10</sub>  | 0.01                                  |
| PM <sub>2.5</sub> | 0.01                                  |
| SO <sub>2</sub>   | 1.23                                  |
| VOC               | 7.76                                  |

### Major New Source Review

The federal New Source Review (NSR) program applies to major stationary sources. The NSR program regulates the installation of new major sources or major modifications to existing major sources and it is comprised of two programs: 1) Prevention of Significant Deterioration (PSD) for projects located in areas where specified pollutant levels have met National Ambient Air Quality Standards (NAAQS); and 2) Nonattainment New Source Review (NNSR) for projects located in areas where pollutant levels have not attained the corresponding NAAQS.

The Newell Refinery is located in Hancock County which is currently in an attainment or unclassified status for all NSR pollutants. Therefore, the Major Source Thresholds (MST) are established by the PSD program. Given that the refineries are included in the 'List of 28,' the MST are set at 100 tpy for all pollutants. The Newell



Refinery is an existing major source facility since the current site-wide potential-to-emit (PTE) is over the major source threshold for at least one PSD pollutant.

At an existing major source, PSD is triggered if the project net increase is above the Significant Emissions Rate (SER) for any regulated pollutant. Detailed emissions calculations are provided in Attachment N. As the project increase is less than the SER, PSD is not triggered by the proposed project.

**Table D-2: NSR Major Modification Thresholds**

| <b>Pollutant</b>  | <b>Significant Emissions Rate (TPY)</b> | <b>NSR Program</b> | <b>Major Modification?</b> |
|-------------------|-----------------------------------------|--------------------|----------------------------|
| CO                | 100                                     | PSD                | No                         |
| NO <sub>x</sub>   | 40                                      | PSD                | No                         |
| PM <sub>10</sub>  | 15                                      | PSD                | No                         |
| PM <sub>2.5</sub> | 10                                      | PSD                | No                         |
| SO <sub>2</sub>   | 40                                      | PSD                | No                         |
| VOC               | 40                                      | PSD                | No                         |

### Title V Operating Permit Program

Title 40 of the Code of Federal Regulations Part 70 (40 CFR 70) establishes the federal Title V operating permit program. West Virginia has incorporated the provisions of this federal program in its Title V operating permit program in West Virginia Code of State Regulations (CSR) 45-30. The major source thresholds with respect to the West Virginia Title V operating permit program regulations are 10 tons per year (tpy) of a single HAP, 25 tpy of any combination of HAP, and 100 tpy of all other regulated pollutants.<sup>1</sup> The facility PTE for VOC, NO<sub>x</sub>, and CO from the Newell Refinery surpass the major source threshold for Title V applicability; therefore, the refinery is a major source with respect to the Title V Program. The facility is current authorized under Title V operating permit is No R30-02900008-2015 MM02/MM03 as most recently modified on June 5, 2017. This application also requests the proposed changes be incorporated into the Title V permit via a minor modification.

### New Source Performance Standards

New Source Performance Standards (NSPS), located in 40 CFR 60, require new, modified, or reconstructed sources to control emissions to the level achievable by the best demonstrated technology as specified in the applicable provisions. Moreover, any source subject to an NSPS is also subject to the general provisions of NSPS Subpart A, except where expressly noted. The following is a summary of applicability and non-applicability determinations for NSPS regulations of relevance to the Newell Refinery’s proposed project.

#### *NSPS Subparts K and Ka - Standards of Performance for Storage Vessels for Petroleum Liquids*

These subparts apply to storage tanks of certain sizes constructed, reconstructed, or modified during various time periods. Subpart K applies to storage tanks constructed, reconstructed, or modified prior to 1978, and Subpart Ka applies to those constructed, reconstructed, or modified prior to 1984.

- The proposed storage tanks (4070 & 4071) are expected to commence construction/modification by the beginning of 2018, the units are not subject to Subpart K or Ka.

<sup>1</sup> On June 23, 2014, the U.S Supreme Court decision in the case of *Utility Air Regulatory Group v. EPA* effectively changed the permitting procedures for GHGs under the PSD and Title V programs.

- The existing gasoline storage tanks proposed for modification (4004, 4005, & 4006) commenced construction in 1971 and the tanks have not previously been “modified” as that term is defined in 40 CFR, Subpart A. As such, the existing gasoline storage tanks were not subject to NSPS K or Ka. As with the new tanks, the proposed modification to the gasoline tanks will occur outside of the window of applicability for NSPS K or Ka.

*NSPS Subparts Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)*

NSPS Subpart Kb, “Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels),” applies to storage vessels with a capacity greater than or equal to 75 m<sup>3</sup> (~ 19,813 gal) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.

Requirements of the rule are based on vessel capacity and material maximum true vapor pressure as summarized in the table below.

**Table D-3. NSPS Kb Applicability Criteria**

| Capacity                                                                   | Maximum True Vapor Pressure                         | NSPS Kb                                             |
|----------------------------------------------------------------------------|-----------------------------------------------------|-----------------------------------------------------|
| ≥ 151 m <sup>3</sup><br>(≥ 39,890 gal)                                     | < 3.5 kPa<br>(< 0.51 psi)                           | Exempt                                              |
| ≥ 75 m <sup>3</sup> but < 151 m <sup>3</sup><br>(≥ 19,813 to < 39,890 gal) | < 15.0 kPa<br>(< 2.17 psi)                          | Exempt                                              |
| ≥ 151 m <sup>3</sup><br>(≥ 39,890 gal)                                     | ≥ 5.2 kPa but < 76.6 kPa<br>(≥ 0.75 to < 11.11 psi) | Floating roof                                       |
| ≥ 75 m <sup>3</sup> but < 151 m <sup>3</sup><br>(≥ 19,813 to < 39,890 gal) | > 27.6 kPa but < 76.6 kPa<br>(> 4.0 to < 11.11 psi) | Floating roof                                       |
| ≥ 75 m <sup>3</sup><br>(≥ 39,890 gal)                                      | ≥ 76.6 kPa<br>(≥ 11.11 psi)                         | Closed vent system & control device (or equivalent) |

The tanks to be installed or modified in the proposed project are detailed below:

- **TK-4070** – The proposed new ethanol tank will have a capacity of 630,000 gallons. The vapor pressure of ethanol is between 0.75 and 11.11 psi. As such, the tank will be a NSPS Kb “affected facility” subject to the floating roof requirements of the rule.
- **TK-4071** – The proposed new gasoline tank will have a capacity of 1,260,000 gallons. The tank will store gasoline products with a vapor pressure between 0.75 and 11.11 psi. As such, the tank will be a NSPS Kb “affected facility” subject to the floating roof requirements of the rule.
- **TK-4004, TK-4005, and TK-4006** – The proposed modifications to these gasoline tanks will increase the capacity of each tank to 1,260,000 gallons. The tank will continue to store gasoline products with a vapor pressure between 0.75 to 11.11 psi. For an existing source to trigger NSPS applicability if must be “modified” or “reconstructed” as defined in NSPS Subpart A.

NSPS Subpart A defines modification as follows:

*Modification* means any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted.

In accordance with this definition, a modification must meet two distinct elements to trigger applicability of the rule: 1) a physical change and 2) an increase in emissions. Raising the shell height will constitute a physical change. In regard to the second criteria, the total emission from a floating roof tank is calculated based on the equation below:

Total Loss = Rim Seal Loss + Deck Fitting Loss + Deck Seam Loss + Withdrawal Loss

Withdrawal loss is proportional to tank throughput while the other three losses are not impacted by throughput. An increase in tank throughput would result in an increase in withdraw loss emissions triggering applicability of NSPS Kb.

NSPS Subpart A defines reconstruction as follows:

*Reconstruction* means the replacement of components of an existing facility to such an extent that:

- (1) The fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new facility, and
- (2) It is technologically and economically feasible to meet the applicable standards set forth in this part.

The cost of the proposed changes to TK-4004, TK-4005, and TK-4006 will not exceed 50% of the cost of a new storage tank. As such, the tanks will not be reconstructed under NSPS Kb.

- **TK-4072** – The proposed new feedstock tank will be a fixed roof tank with a capacity of 1,260,000 gallons. The vapor pressure of the feedstock is less than 0.51 psi. In accordance with 40 CFR 60.110b(b), NSPS Kb will not apply to the tank.
- **TK-4050** – This tank is subject to NSPS Kb including the internal floating roof requirements of the rule. The proposed project has no impact on NSPS applicability for this tank.
- **TK-4012, TK-4013, TK-4014, TK-4015, TK-4016, TK-4052 and TK-4053** – These tanks commenced construction prior to the applicability dates for NSPS K/Ka/Kb. The proposed project does not involve a physical change or a change in the method of operation. Additionally, TK-4052 and 4053 are below the capacity threshold for Kb applicability. As such, the tanks will not be subject to NSPS as a result of the project.

*NSPS Subparts GGGa - Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006*

The platformer unit is currently subject to NSPS GGGa. The process unit will remain subject to NSPS GGGa.

### *Non-Applicability of All Other NSPS*

NSPS are developed for particular industrial source categories. All other NSPS are categorically not applicable to the storage tank project at the Newell Refinery.

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

Part 63 NESHAP allowable emission limits are established on the basis of a maximum achievable control technology (MACT) determination for a particular major source. A HAP major source is defined as having potential emissions in excess of 25 tpy for total HAP and/or potential emissions in excess of 10 tpy for any individual HAP. The Newell Refinery is an area (minor) source of HAP since its potential emissions of HAP are less than the 10/25 major source thresholds. NESHAP apply to sources in specifically regulated industrial source categories (Clean Air Act Section 112(d)) or on a case-by-case basis (Section 112(g)) for facilities not regulated as a specific industrial source type:

- > 40 CFR Part 63 Subpart CC – National Emission Standards for Hazardous Air Pollutants From Petroleum Refineries
- > 40 CFR Part 63 Subpart UUU- National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units

The applicability of these NESHAP Subparts is discussed in the following sections.

#### *40 CFR 63 Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries*

This subpart applies to affected emission points that are located at facilities that are major sources of HAP and emit a pollutant listed in Table 1 of the rule. The Newell Refinery is an area HAP source; as such this rule does not apply.

#### *40 CFR 63 Subpart UUU- National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units*

This subpart applies to affected emission points that are located at facilities that are major sources of HAP. The Newell Refinery is an area HAP source; as such this rule does not apply.

### **West Virginia SIP Regulations**

The equipment associated with the proposed project at the Newell Refinery is potentially subject to regulations contained in the West Virginia Code of State Regulations, Chapter 45 (Code of State Regulations). The Code of State Regulations fall under two main categories, those regulations that are generally applicable (e.g., permitting requirements), and those that have specific applicability (e.g., PM standards for manufacturing equipment). The following sections address just those regulations applicable to the storage tank emissions sources.

#### *45 CSR 16: Standards of Performance for New Stationary Sources*

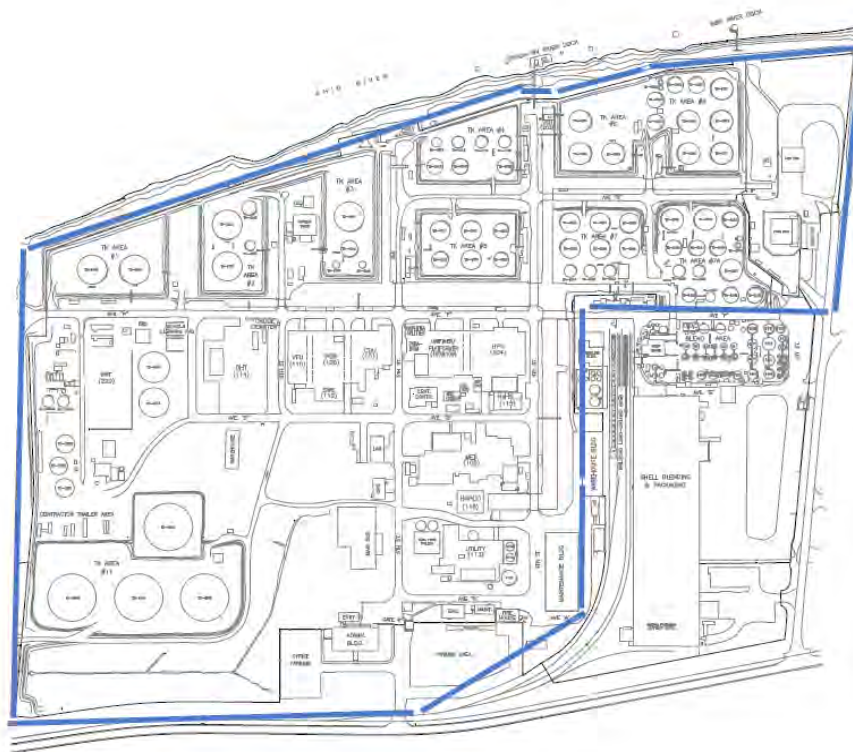
45 CSR 16-1 incorporates the federal Clean Air Act (CAA) standards of performance for new stationary sources set forth in 40 CFR Part 60 by reference. As such, by complying with all applicable requirements of 40 CFR Part 60 at the Newell Refinery, EWVI will be complying with 45 CSR 16.

*45 CSR 21-28: Petroleum Liquid Storage in Fixed Roof Tanks*

This regulation applies to sources located in Putnam County, Kanawha County, Cabell County, Wayne County, and Wood County. The Newell Refinery is located in Hancock County; as such, this state rule does not apply.

## ATTACHMENT E - PLOT PLAN

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SCALE : 1"=100'-0"

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**NOTES**

| REFERENCE DRAWINGS |                  |
|--------------------|------------------|
| NO.                | DESCRIPTION      |
| 0                  | AS SHOWN ON FILE |
| 1                  | AS SHOWN ON FILE |
| 2                  | AS SHOWN ON FILE |

| REVISIONS |      |     |       |      |
|-----------|------|-----|-------|------|
| NO.       | DATE | BY  | CHKD. | APP. |
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 Chemical, WV

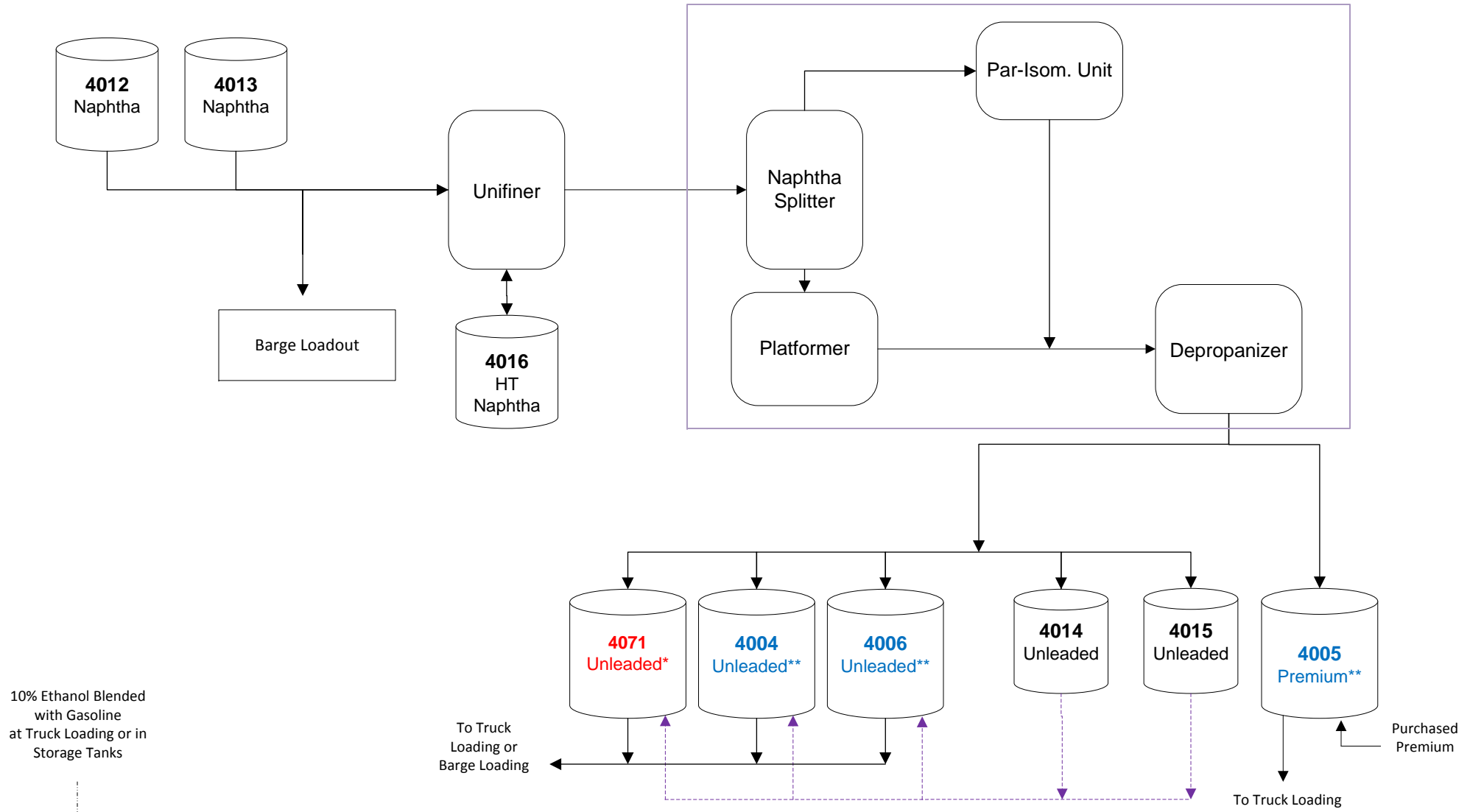
| PROJECT                   |           | SHEET                 |                |
|---------------------------|-----------|-----------------------|----------------|
| ERCON WEST VIRGINIA, INC. | REFINERY  | NEWELL, WEST VIRGINIA | SITE PLOT PLAN |
| DATE DRAWN                | DATE PLOT | DATE CHECKED          | DATE PLOTTED   |
| JMB                       | 11/21/07  | LAKH/MS               | L-100A01-155   |
|                           |           |                       | 2              |

## ATTACHMENT F - PROCESS FLOW DIAGRAM

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Simplified diagram for the purposes of explaining basic facility flow and emission points. The actual design is more complex.



10% Ethanol Blended with Gasoline at Truck Loading or in Storage Tanks

To Truck Loading or Barge Loading

Purchased Premium

To Truck Loading

Purchased Ethanol

**Flow Legend**

- > Liquid is transferred from 4014 & 4016 into 4071, 4004, or 4006 before loading
- > Gasoline and Ethanol are combined before loading

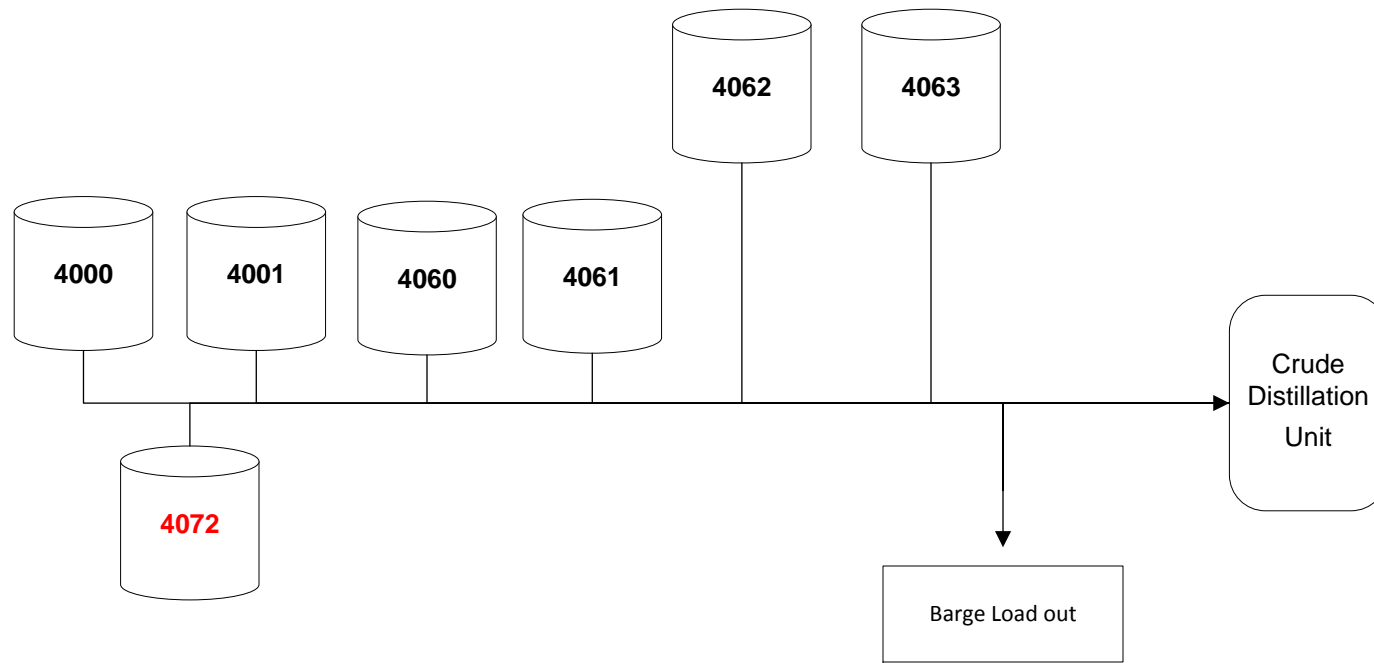
\*New Tank \*\*Modified Tank

**Process Flow Diagram**

**Ergon – West Virginia, Inc.**  
Newell Refinery

April 2018

Simplified diagram for the purposes of explaining basic facility flow and emission points. The actual design is more complex.



|                                     |                                                        |
|-------------------------------------|--------------------------------------------------------|
| <p>Flow Legend</p> <p>*New Tank</p> | <p><b>Process Flow Diagram</b></p>                     |
|                                     | <p>Ergon – West Virginia, Inc.<br/>Newell Refinery</p> |
|                                     | <p>April 2018</p> <p></p>                              |

## ATTACHMENT G - PROCESS DESCRIPTION

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## ATTACHMENT G - PROCESS DESCRIPTION

The Newell Refinery processes crude oil into fuels and other industrial chemical feedstocks through the use of distillation and chemical reaction processes. The platformer unit represents a stage in this process where naphtha is converted to gasoline. The storage tanks involved in the current project include gasoline, naphtha, and ethanol. Specifically, the proposed project includes the following:

- > Add an additional gasoline storage tank (TK-4071);
- > Add an additional ethanol storage tank (TK-4070); and
- > Modify three existing gasoline tanks (TK-4004, TK-4005, and TK-4006) to increase the shell height and storage capacity of the tanks.

Additionally, the application includes a second unrelated project to install a new feedstock tank.

### **Gasoline Tanks**

The gasoline tank project will allow EWVI to better manage inventory of gasoline products and ethanol. For example, EWVI performs routine periodic inspections of the gasoline storage tanks at the Newell Refinery. These inspections are performed for environmental, safety, and tank integrity purposes. Tank inspections cannot be done while loading in to or out of a tank and require that a tank be emptied. The new gasoline storage tank (TK-4071) will allow EWVI more flexibility for removing a tank from service for completing an inspection. Raising the tank shells for Tanks TK-4004, TK-4005, and TK-4006 will also allow for greater flexibility for removing a tank from service as well as allow for better scheduling for product shipments.

Additionally, the gasoline tank project will also allow for additional throughput from the platformer through the gasoline tanks.

### **Ethanol Tanks**

EWVI purchases ethanol for use in blending with products manufactured at the Newell Refinery. The new ethanol tank (TK-4070) is needed to allow flexibility on delivery of barges. A typical barge load of ethanol is 10,000 to 12,000 gallons. Current ethanol storage capacity is 690,480 gallons. (630,000 for TK-4050 and 30,240 each for TK-4052 & TK-4053). Currently, EWVI must schedule barges at specific times so the tanks are low enough to receive the full barge quantity. Further, if TK-4050 is removed from service for inspection, then use of only TK-4052 and 4053 results in a high tank turnover rate and timing of barge delivery becomes critical. The additional storage tank would allow greater flexibility on the timing of receiving barges of ethanol and reduce the turnover rate for TK-4052 and TK-4053 during periods of ethanol tank inspections.

### **Feedstock Tank**

The crude tank project is proposed to allow for blending of a new feedstock into the crude distillation unit. The new feed is a heavier crude material that is currently used at the facility. Ergon is not increasing the feed rate to the process but rather, offsetting the decline in current crude stock. No physical changes to the refinery processes are needed as a result of the new feed as the refinery is capable of accommodating the feed type as currently operated. The project may marginally skew refinery yield to more heavy products than lighter products when the new crude is charged, but should not otherwise impact other product or unit feed rates.

**Permit Changes Requested**

Ergon is requesting the gasoline/ethanol tank group throughput limit and plant-wide tank emissions limits be increased as follows:

| <b>Category</b>                                                  | <b>Current R13AA Limit</b>    | <b>Proposed Limit</b>         |
|------------------------------------------------------------------|-------------------------------|-------------------------------|
| Gasoline and ethanol tank throughput                             | 282,320,300 gallons per year  | 318,034,443 gallons per year  |
| Crude oil tank throughput                                        | 802,264,890 gallons per year  | No change requested           |
| Light crude oil w/vapor pressure up to 11.0 psia tank throughput | 306,600,000 gallons per year  | No change requested           |
| Heavy products or kerosene tank throughput                       | 406,459,760 gallons per year  | No change requested           |
| Heavy products tank throughput                                   | 550,817,989 gallons per year  | No change requested           |
| Combined emissions from the EWVI storage tanks                   | 5.39 tons per month (tpm) VOC | 5.79 tons per month (tpm) VOC |
|                                                                  | 53.87 tons per year (tpy) VOC | 57.85 tons per year (tpy) VOC |
|                                                                  | 0.08 tpm Benzene              | 0.08 tpm Benzene              |
|                                                                  | 0.81 tpy Benzene              | 0.81 tpy Benzene              |
|                                                                  | 0.65 tpm Total HAP            | 0.65 tpm Total HAP            |
|                                                                  | 6.54 tpy Total HAP            | 6.54 tpy Total HAP            |

## ATTACHMENT H - SAFETY DATA SHEETS (SDS)

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**Section 1 - Chemical Product and Company Identification**

**Product Name:** UNL Premium 93  
**Chemical Name:** Unleaded Gasoline  
**Chemical Family:** Petroleum Hydrocarbon  
**Chemical Formula:** Mixture  
**CAS Number:** 8006-61-9  
**Other Designations:** Petrol, Unleaded Premium Gasoline  
**Manufacturer:** Ergon -- West Virginia, Inc., P.O. Box 356, Newell, WV 26050  
**Company Contact:** Will Poe, Phone (601) 630-8319 (Vicksburg, MS)

**EMERGENCY TELEPHONE NUMBERS:**

Ergon -- West Virginia, Inc. (601) 630-8319 (Vicksburg, MS) Normal Business Hours  
 Chemtrec (800) 424-9300 After Business Hours

**Section 2 - Composition / Information on Ingredients**

This product may be regulated, have exposure limits or other information identified as the following: Unleaded Gasoline (wholly vaporized). This product is considered a hazardous product under 29 CFR 1910.1200 (Hazard Communication).

| Ingredient Name | CAS Number | % vol  |
|-----------------|------------|--------|
| Gasoline        | 8006-61-9  | 95-100 |
| Benzene         | 71-43-2    | 1-5    |

| Ingredient | OSHA PEL                           |                                     | ACGIH TLV                          |                                     | NIOSH REL    |       | NIOSH IDLH |
|------------|------------------------------------|-------------------------------------|------------------------------------|-------------------------------------|--------------|-------|------------|
|            | TWA                                | STEL                                | TWA                                | STEL                                | TWA          | STEL  |            |
| Gasoline   | 300 ppm;<br>900 mg/ m <sup>3</sup> | 500 ppm;<br>1500 mg/ m <sup>3</sup> | 300 ppm;<br>890 mg/ m <sup>3</sup> | 500 ppm;<br>1480 mg/ m <sup>3</sup> |              |       |            |
| Benzene    | 10 ppm                             | 50 ppm                              | 10 ppm;<br>32 mg/ m <sup>3</sup>   |                                     | None establ. | 1 ppm |            |

**Section 3 - Hazards Identification**

☆☆☆☆☆ **Emergency Overview** ☆☆☆☆☆

**DANGER! EXTREMELY FLAMMABLE. ASPIRATION (INADVERTENT SUCTION) INTO LUNGS CAN PRODUCE CHEMICAL PNEUMONIA OR EVEN DEATH. CONTAINS BENZENE WHICH MAY CAUSE CANCER OR BE TOXIC TO BLOOD-FORMING ORGANS.**

**HMIS**  
**H** 1  
**F** 3  
**R** 0  
**PPE**†  
 †Sec. 8

Material will readily ignite at normal temperatures. Flammable liquid - may release vapors that form flammable mixtures at or above the flash point. Excessive inhalation of this material may cause headache, dizziness and incoordination. Water may be an ineffective extinguishing medium. Foam (preferred), dry chemical, water. Wear full set of protective equipment including chemical goggles and gloves.

Gasoline is either a clear or colored liquid with a strong hydrocarbon odor. Gasoline is a volatile and extremely flammable liquid and may cause flash fires. Keep away from heat, sparks or flame. Gasoline can also contain significant concentrations of benzene, which has been shown to cause cancer or be toxic to blood-forming organs. Never siphon this product by mouth. If swallowed, gasoline may get sucked into the lungs (aspirated) and cause lung damage or even death.

CONSUMER WARNING LABEL:

GASOLINE HEALTH & SAFETY WARNING

- EXTREMELY FLAMMABLE, VAPORS MAY EXPLODE
- HARMFUL OR FATAL IF SWALLOWED
- LONG TERM EXPOSURE TO VAPORS HAS CAUSED CANCER IN LABORATORY ANIMALS
- KEEP FACE AWAY FROM NOZZLE WHILE FILLING
- KEEP NOZZLE AWAY FROM EYES AND SKIN
- NEVER SIPHON BY MOUTH
- DON'T OVERFILL TANK

FOR USE AS A MOTOR FUEL ONLY

\*\*\*\*\*

**Potential Health Effects/Primary Entry Routes**

**Inhalation:** Exposure to vapor concentrations exceeding 1,000 ppm can cause respiratory irritation, headache, dizziness, nausea and loss of coordination. Higher concentrations may cause loss of consciousness, cardiac sensitization, coma and death resulting from respiratory failure. Intentional overexposure to high concentrations of gasoline vapors (such as gasoline sniffing) can cause nervous system and brain damage, convulsions and sudden death from cardiac arrest.

**Eye:** Eye irritation may result from contact with the liquid or exposure to vapor concentrations above the TLV.

**Skin:** Prolonged or repeated liquid contact can defeat the skin and lead to irritation and/or dermatitis.

**Ingestion:** Ingestion may result in nausea, vomiting, diarrhea and restlessness. Aspiration (inadvertent suction) of liquid into the lungs must be avoided as even small quantities in the lungs can produce chemical pneumonitis, pulmonary edema/hemorrhage and even death.

**Carcinogenicity:** The International Agency for Research on Cancer (IARC) has determined that there is inadequate evidence for the carcinogenicity of gasoline in humans. IARC determined that limited evidence of carcinogenicity in animals exists. IARCIS overall evaluation of gasoline, in spite of limited carcinogenicity evidence, has resulted in the IARC designation of gasoline as possibly carcinogenic to humans (Group 2B) because gasoline contains benzene. The National Toxicology Program (NTP), OSHA and IARC have determined that there is sufficient evidence for the carcinogenicity of benzene in humans (Group 1A). IARC has determined that there is inadequate evidence for the carcinogenicity of gasoline engine exhaust in humans or animals. However, IARCIS overall evaluation on gasoline engine exhaust, in spite of the absence of carcinogenicity data, has resulted in the IARC designation of gasoline engine exhaust as possibly carcinogenic to humans (Group 2B) because of the presence of certain engine exhaust components.

**Medical Conditions Aggravated by Long-term Exposure (Chronic Effects) :** Pre-existing eye, skin, respiratory, liver and/or kidney disorders may be aggravated by exposure to gasoline.

**Section 4 - First Aid Measures**

**Inhalation:** Remove to fresh air. Call a physician.

**Eye Contact:** In case of contact with eyes, rinse immediately with plenty of water and seek medical advice.

**Skin Contact:** Remove contaminated clothing. Wash affected area with mild soap and water. Launder contaminated clothing before reuse. Get medical attention if skin disorder develops.

**Ingestion:** If the material is swallowed, get immediate medical attention or advice. Do not induce vomiting.

**Notes to Physician:** Pulmonary aspiration hazard if swallowed; treat symptomatically.

**Section 5 - Fire-Fighting Measures**

**Flash Point:** - 45 °F

**Flash Point Method:** not available

**Burning Rate:** not available

**Autoignition Temperature:** > 500 °F

**Lower Flammable Limit (LFL):** 1.4

**Upper Flammable Limit (UFL):** 7.6

**Flammability Classification:** not available

**Extinguishing Media:** Foam (preferred), dry chemical, water. Water may be an ineffective extinguishing medium. Use water to cool fire-exposed containers and to protect personnel.





**General Fire Hazards:** Extremely flammable liquid; material can ignite readily at normal temperatures. Vapors may form flammable mixtures. Empty containers may retain product residue including flammable or explosive vapors. Do not cut, drill, grind, or weld near full, partially full, or empty product containers. Do not cut, weld, solder, drill, grind, or expose containers to heat, flame, sparks, or other sources of ignition. Static charge may accumulate and spark or ignite. Toxic fumes, gases or vapors may evolve on burning.

**Hazardous Combustion Products:** carbon monoxide and carbon dioxide.

**Fire-Fighting Equipment/Instructions:** Wear full set of protective equipment including chemical goggles and gloves. Wear self-contained breathing apparatus with a full facepiece operated in the positive pressure demand mode when fighting fires.

## Section 6 - Accidental Release Measures

**Containment Procedures:** Stop the flow of material, if this is without risk. Dike the spilled material, where this is possible.

**Clean-Up Procedures:** Absorb with inert absorbent such as dry clay, sand or diatomaceous earth, commercial sorbents, or recover using pumps. Wear appropriate protective equipment and clothing during clean-up. Thoroughly wash the area after a spill or leak clean-up. Do not allow the spilled product to enter public drainage system or open water courses.

**Evacuation Procedures:** Evacuate the area promptly. Keep upwind of the spilled material and isolate exposure.

**Special Instructions:** Remove soiled clothing and laundry before reuse. Avoid skin contact and inhalation of vapors during disposal of spills.

## Section 7 - Handling and Storage

**Procedures for Handling:** Do not breathe gas/fumes/vapor/spray. Use this product with adequate ventilation. Do not get this material in your eyes, on your skin, or on your clothing. Keep this product from heat, sparks, or open flame. Wash thoroughly after handling. Do not reuse the empty container. Wash thoroughly after handling. Empty drums should be completely drained, properly bunged and promptly returned to a drum reconditioner, or promptly disposed of.

**Recommended Storage Methods:** Keep the container tightly closed and in a cool, well-ventilated place. Do not store this material in open or unlabeled containers. Eliminate all sources of ignition. Store away from strong oxidizers. This material can accumulate static charge which may cause spark and become an ignition source.

## Section 8 - Exposure Controls / Personal Protection

### Exposure Guidelines:

A. General Product Information - Follow the recommended exposure limits.

B. Component Exposure Limits

Gasoline (CAS # 8006-61-9)

ACGIH: TLV: 300 ppm; 890 mg/m<sup>3</sup>; STEL: 500 ppm; 1480 mg/m<sup>3</sup>

OSHA: PEL: 300 ppm; 900 mg/m<sup>3</sup>; STEL: 500 ppm; 1500 mg/m<sup>3</sup>

Benzene (CAS # 71-43-2)

ACGIH: TLV: 10 ppm; 32 mg/m<sup>3</sup>; STEL: 500 ppm; 1480 mg/m<sup>3</sup>

OSHA: PEL: 10 ppm (unless specified in 1910.1028)

STEL: 50 ppm (10 min) (unless specified in 1910.1028)

Ceiling: 25 ppm (unless specified in 1910.1028)

NIOSH: STEL: 1 ppm

**Engineering Controls:** Use local exhaust ventilation. Explosion-proof exhaust devices are required.

**Eye / Face Protection:** Wear safety glasses; chemical goggles (if splashing is possible).

**Skin Protection:** Use impervious gloves for prolonged contact. The use of neoprene gloves is recommended.

**Respiratory Protection:** For high concentration of vapors or mists use NIOSH/MSHA approved vapor/mist cartridge respirator.

**General:** Use good industrial hygiene practices.

## Section 9 - Physical and Chemical Properties

**Physical State:** Orange Liquid  
**Appearance:** Clear or colorless  
**Odor:** Petroleum  
**Odor Threshold:** not available  
**Vapor Pressure:** 360-700 mm Hg  
**Vapor Density (Air=1):** 3 - 4  
**Specific Gravity (H<sub>2</sub>O=1):** <0.8

**Water Solubility:** insoluble  
**Boiling Point:** IBP=85°F, EP=435°F  
**Melting Point:** not available  
**% Volatile:** 100  
**Evaporation Rate:** <1 (butyl acetate = 1)  
**pH:** not available

## Section 10 - Stability and Reactivity

**Chemical Stability:** Stable  
**Hazardous Polymerization:** Hazard polymerization will not occur.  
**Chemical Incompatibilities:** This product may react with strong oxidizing agents.  
**Conditions to Avoid (Stability):** Avoid excessive heat and all sources of ignition.  
**Hazardous Decomposition Products:** Smoke, carbon dioxide and carbon monoxide.

## Section 11- Toxicological Information

### Acute Toxicity / Target Organ Information:

#### A. General Product / Component Information

Benzene can cause blood and blood-producing system disorders. Aspiration of material into the lungs can cause bronchopneumonia or pulmonary edema. Product can affect the central nervous system, kidney, liver and blood-forming system.

#### B. Component LD50 / LC50

Benzene (CAS # 71-43-2)

Inhalation, rat: LC50 = 10,000 ppm 7 hr oral, rat: LD50 = 3306 mg/kg

Skin, mouse: LD50 = 48 mg/kg

**Epidemiology:** Studies have shown that prolonged exposure to the benzene component can cause leukemia and other serious blood disorders and complications to the blood-producing system.

### Carcinogenicity:

A. General Product / Component Information - IARC has found gasoline to be a possible human carcinogen.

#### B. Component Carcinogenicity Listings

Gasoline (CAS # 8006-61-9)

OSHA: Possible Select Carcinogen

IARC: Group 2B - Possibly carcinogenic to humans.

Benzene (CAS # 71-43-2)

ACGIH: (A2) - suspected human carcinogen

OSHA: Select Carcinogen

NIOSH: Y

NTP: Known Carcinogen

IARC: Group 1 - Carcinogenic to humans.

**Teratogenicity / Reproductive Effects:** Animal studies have shown that repeated exposure to benzene can damage the embryo or fetus.

**Neurotoxicity:** Excessive exposure can cause dizziness and central nervous system depression.

**Mutagenicity:** No data available on this product as a whole.

**Other Information:** No information available.

## Section 12 - Ecological Information

**Ecotoxicity:** No information is available on ecotoxicity of this product. Keep product out of sewers and waterways.  
**Environmental Fate:** No information is available.

**Section 13 - Disposal Considerations**

**U.S. EPA Waste Number & Descriptions:**

- A. General Product Information - User must test waste using methods described in 40 CFR 261 to determine if it meets applicable definitions of hazardous wastes. As shipped, this product is considered a D001 ignitable waste.
- B. Component Waste Numbers - Benzene (CAS # 71-43-2) is listed as a U019 (Ignitable waste, Toxic waste) and D018 hazardous waste.

**Disposal Instructions:**

Do not allow this material to drain into sewers / water supplies. Dispose of waste material according to Local, State, Federal, and Provincial Environmental Regulation.

**Section 14 - Transport Information**

**Proper Shipping Name:** Gasoline  
**Hazard Class:** 3.1  
**DOT ID No.:** UN1203  
**Packing Group:** II  
**DOT Shipping Label:** Flammable Liquid

**Additional Shipping Information:**  
 Packaging containing more than 10 pounds of benzene must be designated "RQ" in the proper shipping name.  
**International Transportation Regulations:**  
 No additional information.

**Section 15 - Regulatory Information**

**U.S. Federal Regulatory Information:**

- A. General Product Information - All components of this product are listed on the U.S. EPA TSCA Inventory.
- B. Component Information - This material contains one or more of the following chemicals required to be identified under SARA Section 302 (40 CFR 355 Appendix A), SARA Section 313 (40 CFR 372.65) and/or CERCLA (40 CFR 302.4):  
 Benzene (CAS # 71-43-2, 1 - 5%)  
 SARA 313: form R reporting required for 0.1% de minimus concentration  
 CERCLA: final RQ = 10 pounds (4.54 kg)

**State Regulations:**

- A. General Product Information - Unleaded gasoline requires labeling under California Proposition 65.
- B. Component Information - The following components appear on one or more of the following state hazardous substance lists:

| Component | CAS #     | CA | FL | MA | MN | NJ | PA |
|-----------|-----------|----|----|----|----|----|----|
| Gasoline  | 8006-61-9 | Y  | Y  | Y  | Y  | Y  | N  |
| Benzene   | 71-43-2   | Y  | Y  | Y  | Y  | Y  | Y  |

The following statement(s) are provided under the California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65):

**WARNING!** This product contains a chemical known to the state of California to cause cancer.

**Other Regulations:**

- A. General Product Information - All known (non-proprietary) components of this product are listed on the EINECS inventory of existing chemicals.
- B. Component Information

**CANADA**

The following components are identified under the Canadian Hazardous Products Act Ingredient Disclosure List:

| Component | CAS #     | %        | Minimum Concentration |
|-----------|-----------|----------|-----------------------|
| Gasoline  | 8006-61-9 | 95 - 100 | 1% item 793 (802)     |
| Benzene   | 71-43-2   | 1 - 5    | 0.1% item 153 (277)   |

**Section 16 - Other Information**

**Key / Legend**

N = no; Y = yes; ppm - parts per million; mg/m<sup>3</sup> = milligrams per cubic meter of air; ACGIH = American Conference of Governmental Industrial Hygienists; OSHA = Occupational Safety and Health Administration; TLV = Threshold Limit Value; NIOSH = National Institute of Occupational Safety and Health; NTP = National Toxicology Program; IARC = International Agency for Research on Cancer.

**Prepared By:** Will Poe                      **Phone:** (601) 630-8319

|                               |                   |                                      |
|-------------------------------|-------------------|--------------------------------------|
| <b>Supersedes MSDS Dated:</b> | June 1, 2007      | Changed date                         |
|                               | June 1, 2005      | Changed date                         |
|                               | December 16, 2003 | Changed date                         |
|                               | January 1, 2001   | Changed date                         |
|                               | July 19, 1997     | Changed date and added more hazards. |

**Disclaimer:** Ergon -- West Virginia, Inc. believes this information is accurate but not all-inclusive in all circumstances. It is the responsibility of the user to determine suitability of the material for their purposes. No warranty, expressed or implied, is given.

UNL Regular

Date of Preparation: October 1, 2009

**Section 1 - Chemical Product and Company Identification**

**Product Name:** UNL Regular  
**Chemical Name:** Natural Gasoline  
**Chemical Family:** Petroleum hydrocarbons  
**Chemical Formula:** Mixture  
**Other Designations:** Unleaded Regular Gasoline, Natural Gasoline  
**CAS Number:** 8006-61-9  
**Manufacturer:** Ergon -- West Virginia, Inc., P.O. Box 356, Newell, WV 26050  
**Company Contact:** Will Poe, Phone (601) 630-8319 (Vicksburg, MS)

**EMERGENCY TELEPHONE NUMBERS:**

Ergon -- West Virginia, Inc. (601) 630-8319 (Vicksburg, MS) Normal Business Hours  
 Chemtrec (800) 424-9300 After Business Hours

**Section 2 - Composition / Information on Ingredients**

This product may be regulated, have exposure limits or other information identified as the following: Unleaded Gasoline (wholly vaporized). This product is considered a hazardous product under 29 CFR 1910.1200 (Hazard Communication).

| Ingredient Name | CAS Number | % vol  |
|-----------------|------------|--------|
| Gasoline        | 8006-61-9  | 95-100 |
| Benzene         | 71-43-2    | 1-5    |

| Ingredient | OSHA PEL                           |                                     | ACGIH TLV                          |                                     | NIOSH REL |       | NIOSH IDLH |
|------------|------------------------------------|-------------------------------------|------------------------------------|-------------------------------------|-----------|-------|------------|
|            | TWA                                | STEL                                | TWA                                | STEL                                | TWA       | STEL  |            |
| Gasoline   | 300 ppm;<br>900 mg/ m <sup>3</sup> | 500 ppm;<br>1500 mg/ m <sup>3</sup> | 300 ppm;<br>890 mg/ m <sup>3</sup> | 500 ppm;<br>1480 mg/ m <sup>3</sup> |           |       |            |
| Benzene    | 10 ppm                             | 50 ppm                              | 10 ppm;<br>32 mg/ m <sup>3</sup>   |                                     |           | 1 ppm |            |

**Section 3 - Hazards Identification**

☆☆☆☆☆ **Emergency Overview** ☆☆☆☆☆

**DANGER! EXTREMELY FLAMMABLE. ASPIRATION (INADVERTENT SUCTION) INTO LUNGS CAN PRODUCE CHEMICAL PNEUMONIA OR EVEN DEATH. CONTAINS BENZENE WHICH MAY CAUSE CANCER OR BE TOXIC TO BLOOD-FORMING ORGANS.**

**HMIS**  
**H** 1  
**F** 3  
**R** 0  
**PPE**†  
 †Sec. 8

Material will readily ignite at normal temperatures. Flammable liquid - may release vapors that form flammable mixtures at or above the flash point. Excessive inhalation of this material may cause headache, dizziness and incoordination. Water may be an ineffective extinguishing medium. Foam (preferred), dry chemical, water. Wear full set of protective equipment including chemical goggles and gloves.

Gasoline is either a clear or colored liquid with a strong hydrocarbon odor. Gasoline is a volatile and extremely flammable liquid and may cause flash fires. Keep away from heat, sparks or flame. Gasoline can also contain significant concentrations of benzene, which has been shown to cause cancer or be toxic to blood-forming organs. Never siphon this product by mouth. If swallowed, gasoline may get sucked into the lungs (aspirated) and cause lung damage or even death.

GASOLINE HEALTH & SAFETY WARNING

- EXTREMELY FLAMMABLE, VAPORS MAY EXPLODE
- HARMFUL OR FATAL IF SWALLOWED
- LONG TERM EXPOSURE TO VAPORS HAS CAUSED CANCER IN LABORATORY ANIMALS
- KEEP FACE AWAY FROM NOZZLE WHILE FILLING
- KEEP NOZZLE AWAY FROM EYES AND SKIN
- NEVER SIPHON BY MOUTH
- DON'T OVERFILL TANK

FOR USE AS A MOTOR FUEL ONLY

\*\*\*\*\*

**Potential Health Effects/Primary Entry Routes**

**Inhalation:** Exposure to vapor concentrations exceeding 1,000 ppm can cause respiratory irritation, headache, dizziness, nausea and loss of coordination. Higher concentrations may cause loss of consciousness, cardiac sensitization, coma and death resulting from respiratory failure. Intentional overexposure to high concentrations of gasoline vapors (such as gasoline sniffing) can cause nervous system and brain damage, convulsions and sudden death from cardiac arrest.

**Eye:** Eye irritation may result from contact with the liquid or exposure to vapor concentrations above the TLV.

**Skin:** Prolonged or repeated liquid contact can defeat the skin and lead to irritation and/or dermatitis.

**Ingestion:** Ingestion may result in nausea, vomiting, diarrhea and restlessness. Aspiration (inadvertent suction) of liquid into the lungs must be avoided as even small quantities in the lungs can produce chemical pneumonitis, pulmonary edema/hemorrhage and even death.

**Carcinogenicity:** The International Agency for Research on Cancer (IARC) has determined that there is inadequate evidence for the carcinogenicity of gasoline in humans. IARC determined that limited evidence of carcinogenicity in animals exists. IARCIS overall evaluation of gasoline, in spite of limited carcinogenicity evidence, has resulted in the IARC designation of gasoline as possibly carcinogenic to humans (Group 2B) because gasoline contains benzene. The National Toxicology Program (NTP), OSHA and IARC have determined that there is sufficient evidence for the carcinogenicity of benzene in humans (Group 1A). IARC has determined that there is inadequate evidence for the carcinogenicity of gasoline engine exhaust in humans or animals. However, IARCIS overall evaluation on gasoline engine exhaust, in spite of the absence of carcinogenicity data, has resulted in the IARC designation of gasoline engine exhaust as possibly carcinogenic to humans (Group 2B) because of the presence of certain engine exhaust components.

**Medical Conditions Aggravated by Long-term Exposure (Chronic Effects) :** Pre-existing eye, skin, respiratory, liver and/or kidney disorders may be aggravated by exposure to gasoline.

**Section 4 - First Aid Measures**

**Inhalation:** Remove to fresh air. Call a physician.

**Eye Contact:** In case of contact with eyes, rinse immediately with plenty of water and seek medical advice.

**Skin Contact:** Remove contaminated clothing. Wash affected area with mild soap and water. Launder contaminated clothing before reuse. Get medical attention if skin disorder develops.

**Ingestion:** If the material is swallowed, get immediate medical attention or advice. Do not induce vomiting.

**Notes to Physician:** Pulmonary aspiration hazard if swallowed; treat symptomatically.

**Section 5 - Fire-Fighting Measures**

**Flash Point:** - 45 °F

**Flash Point Method:** not available

**Burning Rate:** not available

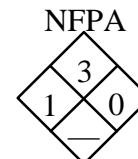
**Autoignition Temperature:** > 500 °F

**Lower Flammable Limit (LFL):** 1.4

**Upper Flammable Limit (UFL):** 7.6

**Flammability Classification:** not available

**Extinguishing Media:** Foam (preferred), dry chemical, water. Water may be an ineffective extinguishing medium. Use water to cool fire-exposed containers and to protect personnel.



**General Fire Hazards:** Extremely flammable liquid; material can ignite readily at normal temperatures. Vapors may form flammable mixtures. Empty containers may retain product residue including flammable or explosive vapors. Do not cut, drill, grind, or weld near full, partially full, or empty product containers. Do not cut, weld, solder, drill, grind, or expose containers to heat, flame, sparks, or other sources of ignition. Static charge may accumulate and spark or ignite. Toxic fumes, gases or vapors may evolve on burning.

**Hazardous Combustion Products:** carbon monoxide and carbon dioxide.

**Fire-Fighting Equipment/Instructions:** Wear full set of protective equipment including chemical goggles and gloves. Wear self-contained breathing apparatus with a full facepiece operated in the positive pressure demand mode when fighting fires.

## Section 6 - Accidental Release Measures

**Containment Procedures:** Stop the flow of material, if this is without risk. Dike the spilled material, where this is possible.

**Clean-Up Procedures:** Absorb with inert absorbent such as dry clay, sand or diatomaceous earth, commercial sorbents, or recover using pumps. Wear appropriate protective equipment and clothing during clean-up. Thoroughly wash the area after a spill or leak clean-up. Do not allow the spilled product to enter public drainage system or open water courses.

**Evacuation Procedures:** Evacuate the area promptly. Keep upwind of the spilled material and isolate exposure.

**Special Instructions:** Remove soiled clothing and laundry before reuse. Avoid skin contact and inhalation of vapors during disposal of spills.

## Section 7 - Handling and Storage

**Procedures for Handling:** Do not breathe gas/fumes/vapor/spray. Use this product with adequate ventilation. Do not get this material in your eyes, on your skin, or on your clothing. Keep this product from heat, sparks, or open flame. Wash thoroughly after handling. Do not reuse the empty container. Wash thoroughly after handling. Empty drums should be completely drained, properly bunged and promptly returned to a drum reconditioner, or promptly disposed of.

**Recommended Storage Methods:** Keep the container tightly closed and in a cool, well-ventilated place. Do not store this material in open or unlabeled containers. Eliminate all sources of ignition. Store away from strong oxidizers. This material can accumulate static charge which may cause spark and become an ignition source.

## Section 8 - Exposure Controls / Personal Protection

### Exposure Guidelines:

A. General Product Information - Follow the recommended exposure limits.

B. Component Exposure Limits

Gasoline (CAS # 8006-61-9)

ACGIH: TLV: 300 ppm; 890 mg/m<sup>3</sup>; STEL: 500 ppm; 1480 mg/m<sup>3</sup>

OSHA: PEL: 300 ppm; 900 mg/m<sup>3</sup>; STEL: 500 ppm; 1500 mg/m<sup>3</sup>

Benzene (CAS # 71-43-2)

ACGIH: TLV: 10 ppm; 32 mg/m<sup>3</sup>; STEL: 500 ppm; 1480 mg/m<sup>3</sup>

OSHA: PEL: 10 ppm (unless specified in 1910.1028)

STEL: 50 ppm (10 min) (unless specified in 1910.1028)

Ceiling: 25 ppm (unless specified in 1910.1028)

NIOSH: STEL: 1 ppm

**Engineering Controls:** Use local exhaust ventilation. Explosion-proof exhaust devices are required.

**Eye / Face Protection:** Wear safety glasses; chemical goggles (if splashing is possible).

**Skin Protection:** Use impervious gloves for prolonged contact. The use of neoprene gloves is recommended.

**Respiratory Protection:** For high concentration of vapors or mists use NIOSH/MSHA approved vapor/mist cartridge respirator.

**General:** Use good industrial hygiene practices.

## Section 9 - Physical and Chemical Properties

**Physical State:** Amber

**Appearance:** Liquid

**Odor:** Petroleum

**Odor Threshold:** not available

**Vapor Pressure:** 300-400 mm Hg

**Vapor Density (Air=1):** 3 - 4

**Specific Gravity (H<sub>2</sub>O=1):** 0.74

**Water Solubility:** insoluble

**Boiling Point:** IBP=140°F, EP=440°F

**Melting Point:** not available

**% Volatile:** 100

**Evaporation Rate:** <1 (butyl acetate = 1)

**pH:** not available

## Section 10 - Stability and Reactivity

**Chemical Stability:** Stable

**Hazardous Polymerization:** Hazard polymerization will not occur.

**Chemical Incompatibilities:** This product may react with strong oxidizing agents.

**Conditions to Avoid (Stability):** Avoid excessive heat and all sources of ignition.

**Hazardous Decomposition Products:** Smoke, carbon dioxide and carbon monoxide.

## Section 11- Toxicological Information

### Acute Toxicity / Target Organ Information:

#### A. General Product / Component Information

Benzene can cause blood and blood-producing system disorders. Aspiration of material into the lungs can cause bronchopneumonia or pulmonary edema. Product can affect the central nervous system, kidney, liver and blood-forming system.

#### B. Component LD50 / LC50

Benzene (CAS # 71-43-2)

Inhalation, rat: LC50 = 10,000 ppm 7 hr oral, rat: LD50 = 3306 mg/kg

Skin, mouse: LD50 = 48 mg/kg

**Epidemiology:** Studies have shown that prolonged exposure to the benzene component can cause leukemia and other serious blood disorders and complications to the blood-producing system.

### Carcinogenicity:

A. General Product / Component Information - IARC has found gasoline to be a possible human carcinogen.

#### B. Component Carcinogenicity Listings

Gasoline (CAS # 8006-61-9)

OSHA: Possible Select Carcinogen

IARC: Group 2B - Possibly carcinogenic to humans.

Benzene (CAS # 71-43-2)

ACGIH: (A2) - suspected human carcinogen

OSHA: Select Carcinogen

NIOSH: Y

NTP: Known Carcinogen

IARC: Group 1 - Carcinogenic to humans.

**Teratogenicity / Reproductive Effects:** Animal studies have shown that repeated exposure to benzene can damage the embryo or fetus.

**Neurotoxicity:** Excessive exposure can cause dizziness and central nervous system depression.

**Mutagenicity:** No data available on this product as a whole.

**Other Information:** No information available.



## Section 12 - Ecological Information

**Ecotoxicity:** No information is available on ecotoxicity of this product. Keep product out of sewers and waterways.  
**Environmental Fate:** No information is available.

## Section 13 - Disposal Considerations

### U.S. EPA Waste Number & Descriptions:

- A. General Product Information - User must test waste using methods described in 40 CFR 261 to determine if it meets applicable definitions of hazardous wastes. As shipped, this product is considered a D001 ignitable waste.
- B. Component Waste Numbers - Benzene (CAS # 71-43-2) is listed as a U019 (Ignitable waste, Toxic waste) and D018 hazardous waste.

### Disposal Instructions:

Do not allow this material to drain into sewers / water supplies. Dispose of waste material according to Local, State, Federal, and Provincial Environmental Regulation.

## Section 14 - Transport Information

**Proper Shipping Name:** Gasoline  
**Hazard Class:** 3.1  
**DOT ID No.:** UN1203  
**Packing Group:** II  
**DOT Shipping Label:** Flammable Liquid

**Additional Shipping Information:**  
 Packaging containing more than 10 pounds of benzene must be designated "RQ" in the proper shipping name.  
**International Transportation Regulations:**  
 No additional information.

## Section 15 - Regulatory Information

### U.S. Federal Regulatory Information:

- A. General Product Information - All components of this product are listed on the U.S. EPA TSCA Inventory.
- B. Component Information - This material contains one or more of the following chemicals required to be identified under SARA Section 302 (40 CFR 355 Appendix A), SARA Section 313 (40 CFR 372.65) and/or CERCLA (40 CFR 302.4):  
 Benzene (CAS # 71-43-2, 1 - 5%)  
     SARA 313: form R reporting required for 0.1% de minimus concentration  
     CERCLA: final RQ = 10 pounds (4.54 kg)

### State Regulations:

- A. General Product Information - Unleaded gasoline requires labeling under California Proposition 65.
- B. Component Information - The following components appear on one or more of the following state hazardous substance lists:

| Component | CAS #     | CA | FL | MA | MN | NJ | PA |
|-----------|-----------|----|----|----|----|----|----|
| Gasoline  | 8006-61-9 | Y  | Y  | Y  | Y  | Y  | N  |
| Benzene   | 71-43-2   | Y  | Y  | Y  | Y  | Y  | Y  |

The following statement(s) are provided under the California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65):

**WARNING!** This product contains a chemical known to the state of California to cause cancer.

### Other Regulations:

- A. General Product Information - All known (non-proprietary) components of this product are listed on the EINECS inventory of existing chemicals.
- B. Component Information

### CANADA

The following components are identified under the Canadian Hazardous Products Act Ingredient Disclosure List:

| Component | CAS #     | %        | Minimum Concentration |
|-----------|-----------|----------|-----------------------|
| Gasoline  | 8006-61-9 | 95 - 100 | 1% item 793 (802)     |
| Benzene   | 71-43-2   | 1 - 5    | 0.1% item 153 (277)   |

**Section 16 - Other Information****Key / Legend**

N = no; Y = yes; ppm - parts per million; mg/m<sup>3</sup> = milligrams per cubic meter of air; ACGIH = American Conference of Governmental Industrial Hygienists; OSHA = Occupational Safety and Health Administration; TLV = Threshold Limit Value; NIOSH = National Institute of Occupational Safety and Health; NTP = National Toxicology Program; IARC = International Agency for Research on Cancer.

**Prepared By:** Will Poe      **Phone:** (601) 630-8319

|                               |                   |                                                      |
|-------------------------------|-------------------|------------------------------------------------------|
| <b>Supersedes MSDS Dated:</b> | June 1, 2007      | Changed date                                         |
|                               | June 1, 2005      | Changed date                                         |
|                               | December 26, 2003 | Changed date                                         |
|                               | January 1, 2001   | Changed date                                         |
|                               | July 19, 1997     | Changed date, contact, and added additional hazards. |

**Disclaimer:** Ergon -- West Virginia, Inc. believes this information is accurate but not all-inclusive in all circumstances. It is the responsibility of the user to determine suitability of the material for their purposes. No warranty, expressed or implied, is given.



# MATERIAL SAFETY DATA SHEET

## 1. Product and Company Identification

**Material name** Denatured Fuel Ethanol  
**Version #** 04  
**Issue date** 08-December-2010  
**Revision date** 12-August-2014  
**Supersedes date** 12-August-2014  
**CAS #** Mixture  
**Synonym(s)** Ethanol \* Ethyl alcohol  
**Manufacturer/Supplier** Cargill, Incorporated  
Minneapolis, MN 55440  
US  
**General Information:** 1-800-370-7386  
**Emergency** 24 Hour Emergency: 1-800-424-9300

## 2. Hazards Identification

**Physical state** Liquid.  
**Appearance** Colorless liquid.  
**Emergency overview** WARNING!  
Flammable liquid and vapor.  
Causes severe eye irritation. Causes skin irritation. Mist or vapor irritating to eyes and respiratory tract. High vapor concentrations may cause central nervous system effects.  
**OSHA regulatory status** This product is hazardous according to OSHA 29 CFR 1910.1200.  
**Potential health effects**  
**Routes of exposure** Inhalation. Ingestion. Eye contact. Skin contact.  
**Eyes** Causes severe eye irritation. Exposed individuals may experience eye tearing, redness, and discomfort.  
**Skin** Causes skin irritation. Exposure may cause redness, itching and inflammation.  
**Inhalation** Inhalation of vapors or mists of the product may be irritating to the respiratory system. Symptoms may include coughing, difficulty breathing and shortness of breath. Breathing of high concentrations may cause dizziness, light-headedness, headache, nausea and loss of coordination.  
**Ingestion** Ingestion may cause irritation and malaise.  
**Target organs** Eyes. Skin. Kidneys. Respiratory system. Central nervous system.  
**Chronic effects** Ethanol may cause reproductive effects. Possible cancer hazard - may cause cancer based on animal data. Repeated or prolonged exposure to the substance can produce target organ damage.  
**Potential environmental effects** Not expected to be harmful to aquatic organisms.

## 3. Composition / Information on Ingredients

| Components       | CAS #     | Percent       |
|------------------|-----------|---------------|
| Ethanol          | 64-17-5   | 95.24 - 98.04 |
| Natural gasoline | 8006-61-9 | 1.96 - 4.76   |

**Composition comments** All concentrations are in percent by weight unless ingredient is a gas. Gas concentrations are in percent by volume.

## 4. First Aid Measures

**First aid procedures**  
**Eye contact** Immediately flush with plenty of water for at least 15 minutes. If easy to do, remove contact lenses. Get medical attention. In case of irritation from airborne exposure, move to fresh air. Get medical attention if symptoms persist.

|                     |                                                                                                                                                                                                                                |
|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Skin contact</b> | Immediately flush with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Get medical attention. Wash contaminated clothing before reuse. Destroy or thoroughly clean contaminated shoes. |
| <b>Inhalation</b>   | If symptomatic, move to fresh air. Get medical attention if symptoms persist.                                                                                                                                                  |
| <b>Ingestion</b>    | Seek medical advice.                                                                                                                                                                                                           |

## 5. Fire Fighting Measures

|                                             |                                                                                                                                                                                                                                                                         |
|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Flammable properties</b>                 | Flammable liquid and vapor. Vapors may cause a flash fire or ignite explosively. Vapors may travel considerable distance to a source of ignition and flash back. The fire could easily be spread by the use of water in an area where the water could not be contained. |
| <b>Extinguishing media</b>                  |                                                                                                                                                                                                                                                                         |
| <b>Suitable extinguishing media</b>         | Water. Water fog. Foam. Dry chemical powder. Carbon dioxide (CO <sub>2</sub> ).                                                                                                                                                                                         |
| <b>Fire fighting equipment/instructions</b> | Self-contained breathing apparatus and full protective clothing must be worn in case of fire.                                                                                                                                                                           |
| <b>Specific methods</b>                     | Use water spray to cool unopened containers. Use water with caution: Material will float and may ignite on the surface of water. Prevent build-up of vapors or gasses to explosive concentrations.                                                                      |
| <b>Hazardous combustion products</b>        | Carbon oxides.                                                                                                                                                                                                                                                          |

## 6. Accidental Release Measures

|                                |                                                                                                                                                                                |
|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Personal precautions</b>    | Wear appropriate personal protective equipment (See Section 8).                                                                                                                |
| <b>Methods for cleaning up</b> | Eliminate all ignition sources. Absorb spill with vermiculite or other inert material, then place in a container for chemical waste.                                           |
|                                | Large Spills: Use water spray to disperse vapors and dilute spill to a nonflammable mixture. Prevent runoff from entering drains, sewers, or streams. Dike for later disposal. |

## 7. Handling and Storage

|                 |                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Handling</b> | Avoid breathing high vapor concentrations. Avoid contact with eyes, skin, and clothing. Do not taste or swallow. Use only with adequate ventilation. Wash thoroughly after handling.                                                                                                                                                                                                                               |
| <b>Storage</b>  | Keep away from heat, spark, open flames and other sources of ignition. Store in tightly closed original container in a well-ventilated place. Non-corrosive in the presence of glass. Corrosive to zinc-galvanized metals. Mildly corrosive to aluminum metal in continual contact, but is suitable for intermittent contact such as transport equipment. Store away from incompatible materials (See Section 10). |

## 8. Exposure Controls / Personal Protection

### Occupational exposure limits

#### US. ACGIH Threshold Limit Values

| Components            | Type | Value    |
|-----------------------|------|----------|
| Ethanol (CAS 64-17-5) | STEL | 1000 ppm |

#### US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000)

| Components            | Type | Value                              |
|-----------------------|------|------------------------------------|
| Ethanol (CAS 64-17-5) | PEL  | 1900 mg/m <sup>3</sup><br>1000 ppm |

#### Canada. Alberta OELs (Occupational Health & Safety Code, Schedule 1, Table 2)

| Components            | Type | Value                              |
|-----------------------|------|------------------------------------|
| Ethanol (CAS 64-17-5) | TWA  | 1880 mg/m <sup>3</sup><br>1000 ppm |

#### Canada. British Columbia OELs. (Occupational Exposure Limits for Chemical Substances, Occupational Health and Safety Regulation 296/97, as amended)

| Components            | Type | Value    |
|-----------------------|------|----------|
| Ethanol (CAS 64-17-5) | STEL | 1000 ppm |

Canada. Manitoba OELs (Reg. 217/2006, The Workplace Safety And Health Act)

| Components            | Type | Value    |
|-----------------------|------|----------|
| Ethanol (CAS 64-17-5) | STEL | 1000 ppm |

Canada. Ontario OELs. (Control of Exposure to Biological or Chemical Agents)

| Components            | Type | Value    |
|-----------------------|------|----------|
| Ethanol (CAS 64-17-5) | STEL | 1000 ppm |

Canada. Quebec OELs. (Ministry of Labor - Regulation Respecting the Quality of the Work Environment)

| Components                       | Type | Value                           |
|----------------------------------|------|---------------------------------|
| Ethanol (CAS 64-17-5)            | TWA  | 1880 mg/m3<br>1000 ppm          |
| Natural gasoline (CAS 8006-61-9) | STEL | 1480 mg/m3                      |
|                                  | TWA  | 500 ppm<br>890 mg/m3<br>300 ppm |

Mexico. Occupational Exposure Limit Values

| Components            | Type | Value                  |
|-----------------------|------|------------------------|
| Ethanol (CAS 64-17-5) | TWA  | 1900 mg/m3<br>1000 ppm |

|                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Biological limit values</b>        | No biological exposure limits noted for the ingredient(s).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Engineering controls</b>           | Ensure adequate ventilation, especially in confined areas.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Personal protective equipment</b>  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Eye / face protection</b>          | Wear safety glasses with side shields (or goggles). Wear a full-face respirator, if needed.                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Skin protection</b>                | Wear chemical-resistant gloves, footwear and protective clothing appropriate for risk of exposure. Contact glove manufacturer for specific information.                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Respiratory protection</b>         | If engineering controls do not maintain airborne concentrations below recommended exposure limits (where applicable) or to an acceptable level (in countries where exposure limits have not been established), an approved respirator must be worn. In the United States of America, if respirators are used, a program should be instituted to assure compliance with OSHA 29 CFR 1910.134. Respirator type: Air-purifying respirator with an appropriate, government approved (where applicable), air-purifying filter, cartridge or canister. |
| <b>Hand protection</b>                | Wear protective gloves.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>General hygiene considerations</b> | Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants.                                                                                                                                                                                                                                                                                                                            |

## 9. Physical & Chemical Properties

|                                     |                                    |
|-------------------------------------|------------------------------------|
| <b>Appearance</b>                   | Colorless liquid.                  |
| <b>Physical state</b>               | Liquid.                            |
| <b>Form</b>                         | Liquid.                            |
| <b>Color</b>                        | Colorless.                         |
| <b>Odor</b>                         | Mild characteristic odor.          |
| <b>Odor threshold</b>               | Not available.                     |
| <b>pH</b>                           | 6.5 - 9                            |
| <b>Vapor pressure</b>               | 3.99 (Natural gasoline denaturant) |
| <b>Vapor density</b>                | 1.6                                |
| <b>Boiling point</b>                | 165 - 175.01 °F (73.89 - 79.45 °C) |
| <b>Melting point/Freezing point</b> | -173 °F (-113.89 °C)               |
| <b>Solubility (water)</b>           | Complete.                          |
| <b>Specific gravity</b>             | 0.789                              |
| <b>Flash point</b>                  | 50.0 - 55.0 °F (10.0 - 12.8 °C)    |

|                                                |                                      |
|------------------------------------------------|--------------------------------------|
| Flammability limits in air, upper, % by volume | 19 %                                 |
| Flammability limits in air, lower, % by volume | 3.3 %                                |
| Auto-ignition temperature                      | > 689 °F (> 365 °C)                  |
| Evaporation rate                               | 3.2 (Butyl acetate = 1)              |
| Viscosity                                      | 1.074 x 10 <sup>-3</sup> Pa-S (25°C) |
| Percent volatile                               | 100 %                                |
| Partition coefficient (n-octanol/water)        | -0.28 (Log Kow)                      |

## 10. Chemical Stability & Reactivity Information

|                                    |                                                                                                                                                                                                                                                         |
|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Chemical stability                 | Material is stable under normal conditions. Non-corrosive in the presence of glass. Corrosive to zinc-galvanized metals. Mildly corrosive to aluminum metal in continual contact, but is suitable for intermittent contact such as transport equipment. |
| Conditions to avoid                | Heat, sparks, flames, elevated temperatures.                                                                                                                                                                                                            |
| Incompatible materials             | Oxidizing materials, nitrates, acids, peroxides, potassium dioxide, bromine hexafluoride, acetyl bromide and sodium metal                                                                                                                               |
| Hazardous decomposition products   | No hazardous decomposition products are known.                                                                                                                                                                                                          |
| Possibility of hazardous reactions | Due to vigorous reaction, ethanol should not be mixed with incompatible materials. Hazardous polymerization does not occur.                                                                                                                             |

## 11. Toxicological Information

|                 |                                                                                                                                                                   |
|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sensitization   | No sensitizing effects known.                                                                                                                                     |
| Acute effects   | May be fatal if inhaled.                                                                                                                                          |
| Chronic effects | Repeated exposure of laboratory animals to high concentrations of gasoline vapors has caused kidney and liver damage. It has also caused cancer in rats and mice. |
| Carcinogenicity | Contains material which may cause cancer.                                                                                                                         |

### IARC Monographs. Overall Evaluation of Carcinogenicity

Natural gasoline (CAS 8006-61-9) 2B Possibly carcinogenic to humans.

### OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not listed.

|                      |                                                                  |
|----------------------|------------------------------------------------------------------|
| Reproductive effects | Ethanol has demonstrated human effects of reproductive toxicity. |
|----------------------|------------------------------------------------------------------|

## 12. Ecological Information

|                                |                                                                                                      |
|--------------------------------|------------------------------------------------------------------------------------------------------|
| Ecotoxicity                    | Expected to be harmful to aquatic organisms. May cause long-term adverse effects in the environment. |
| Environmental effects          | Not available.                                                                                       |
| Aquatic toxicity               | Not available.                                                                                       |
| Persistence and degradability  | No data available.                                                                                   |
| Bioaccumulation / accumulation | No data available.                                                                                   |

### Bioaccumulative potential

#### Octanol/water partition coefficient log Kow

Denatured Fuel Ethanol (CAS Mixture) -0.284, (Log Kow)

|                                 |                    |
|---------------------------------|--------------------|
| Mobility in environmental media | No data available. |
|---------------------------------|--------------------|

## 13. Disposal Considerations

|                                       |                                                                                                                                                     |
|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| Waste codes                           | D001: Waste Flammable material with a flash point <140 °F                                                                                           |
| Disposal instructions                 | Dispose in accordance with applicable federal, state, and local regulations. If discarded, this product is considered a RCRA ignitable waste, D001. |
| Waste from residues / unused products | Dispose of in accordance with local regulations.                                                                                                    |
| Contaminated packaging                | Since emptied containers may retain product residue, follow label warnings even after container is emptied.                                         |

## 14. Transport Information

### DOT

#### Basic shipping requirements:

|                         |                              |
|-------------------------|------------------------------|
| UN number               | UN1987                       |
| Proper shipping name    | Alcohols, n.o.s. (Ethanol)   |
| Hazard class            | 3                            |
| Labels required         | 3                            |
| Packing group           | II                           |
| Environmental hazards   |                              |
| Marine pollutant        | Yes                          |
| Additional information: |                              |
| Special provisions      | 172, IB2, T7, TP1, TP8, TP28 |
| Packaging exceptions    | 4b, 150                      |
| Packaging non bulk      | 202                          |
| Packaging bulk          | 242                          |

### IATA

|                            |                            |
|----------------------------|----------------------------|
| UN number                  | UN1987                     |
| UN proper shipping name    | Alcohols, n.o.s. (Ethanol) |
| Transport hazard class(es) | 3                          |
| Packing group              | II                         |
| ERG code                   | 3L                         |

### IMDG

|                            |                            |
|----------------------------|----------------------------|
| UN number                  | UN1987                     |
| UN proper shipping name    | ALCOHOLS, N.O.S. (Ethanol) |
| Transport hazard class(es) | 3                          |
| Packing group              | II                         |
| Environmental hazards      |                            |
| Marine pollutant           | Yes                        |
| EmS                        | F-E, S-D                   |

### TDG

|                      |                            |
|----------------------|----------------------------|
| UN number            | UN1987                     |
| Proper shipping name | ALCOHOLS, N.O.S. (Ethanol) |
| Hazard class         | 3                          |
| Packing group        | II                         |
| Marine pollutant     | D                          |

## 15. Regulatory Information

**US federal regulations** This product is hazardous according to OSHA 29 CFR 1910.1200.  
All components are on the U.S. EPA TSCA Inventory List.

#### TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)

Not regulated.

#### Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List

Not regulated.

#### CERCLA (Superfund) reportable quantity (lbs) (40 CFR 302.4)

Natural gasoline: 100

#### Superfund Amendments and Reauthorization Act of 1986 (SARA)

|                          |                        |
|--------------------------|------------------------|
| <b>Hazard categories</b> | Immediate Hazard - Yes |
|                          | Delayed Hazard - Yes   |
|                          | Fire Hazard - Yes      |
|                          | Pressure Hazard - No   |
|                          | Reactivity Hazard - No |

#### SARA 302 Extremely hazardous substance

Not listed.

**SARA 311/312 Hazardous chemical** No

**Drug Enforcement Administration (DEA) (21 CFR 1308.11-15)** Not controlled

**Canadian regulations**

This product has been classified in accordance with the hazard criteria of the CPR and the MSDS contains all the information required by the CPR.

**WHMIS status**

Controlled

**WHMIS classification**

B2 - Flammable Liquids  
D2A - Other Toxic Effects-VERY TOXIC  
D2B - Other Toxic Effects-TOXIC

**WHMIS labeling****Inventory status**

| Country(s) or region        | Inventory name                                                         | On inventory (yes/no)* |
|-----------------------------|------------------------------------------------------------------------|------------------------|
| Australia                   | Australian Inventory of Chemical Substances (AICS)                     | Yes                    |
| Canada                      | Domestic Substances List (DSL)                                         | Yes                    |
| Canada                      | Non-Domestic Substances List (NDSL)                                    | No                     |
| China                       | Inventory of Existing Chemical Substances in China (IECSC)             | Yes                    |
| Europe                      | European Inventory of Existing Commercial Chemical Substances (EINECS) | Yes                    |
| Europe                      | European List of Notified Chemical Substances (ELINCS)                 | No                     |
| Japan                       | Inventory of Existing and New Chemical Substances (ENCS)               | No                     |
| Korea                       | Existing Chemicals List (ECL)                                          | Yes                    |
| New Zealand                 | New Zealand Inventory                                                  | Yes                    |
| Philippines                 | Philippine Inventory of Chemicals and Chemical Substances (PICCS)      | Yes                    |
| United States & Puerto Rico | Toxic Substances Control Act (TSCA) Inventory                          | Yes                    |

\*A "Yes" indicates this product complies with the inventory requirements administered by the governing country(s).

A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

**State regulations****US - California Hazardous Substances (Director's): Listed substance**

Ethanol (CAS 64-17-5) Listed.  
Natural gasoline (CAS 8006-61-9) Listed.

**US - California Proposition 65 - Carcinogens & Reproductive Toxicity (CRT): Listed substance**

Methanol (CAS 67-56-1) Listed.

**US - California Proposition 65 - CRT: Listed date/Developmental toxin**

Methanol (CAS 67-56-1) Listed: March 16, 2012 Developmental toxin.

**US. Massachusetts RTK - Substance List**

Ethanol (CAS 64-17-5) Listed.  
Natural gasoline (CAS 8006-61-9) Listed.

**US. New Jersey Worker and Community Right-to-Know Act**

Ethanol (CAS 64-17-5)  
Natural gasoline (CAS 8006-61-9)

**US. Pennsylvania Worker and Community Right-to-Know Law**

Not listed.

**Mexico regulations**

This safety data sheet was prepared in accordance with the Official Mexican Standard (NOM-018-STPS-2000).

**16. Other Information****HMIS® ratings**

Health: 2\*  
Flammability: 3  
Physical hazard: 0

**NFPA ratings**



**Disclaimer**

To the best of our knowledge, the information contained herein is accurate. However, neither the above named supplier nor any of its subsidiaries assumes any liability whatsoever for completeness of the information contained herein. Final determination of suitability of any material is the sole responsibility of the user. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards that exist.

**Prepared by**

Not available.



THE INTERNATIONAL GROUP, INC.

# SAFETY DATA SHEET

## 1. Identification

**Product identifier** 0200 Series Products (Petrofibe®)  
**Other means of identification** See page 8  
**SDS number** 0200 Series (928960)\_USA\_English  
**Recommended use** Further processing , Misc. multiple uses  
**Recommended restrictions** None known.

### Manufacturer/Importer/Supplier/Distributor information

**Company Name** The International Group Inc.  
**Address** 50 Salome Dr.  
Toronto  
ON, M1S2A8, CA  
**Telephone** 001-(416)-293-4151  
**E-mail** -  
**Contact person** -  
**Emergency phone number** 001-(416)-293-4151  
001-(800)-561-3509  
**CHEMTREC (North Amerca)** 001-(800)-424-9300

## 2. Hazard(s) identification

**Physical hazards** Not classified.  
**Health hazards** Not classified.  
**OSHA defined hazards** Not classified.

This product does not meet the criteria for classification according to OSHA Hazard Communication Standard (OSHA GHS).

### Label elements

**Hazard symbol** None.  
**Signal word** None.  
**Hazard statement** The product does not meet the criteria for classification.  
**Precautionary statement**  
**Prevention** Observe good industrial hygiene practices.  
**Response** Wash hands after handling.  
**Storage** Store away from incompatible materials.  
**Disposal** Dispose of waste and residues in accordance with local authority requirements.

**Hazard(s) not otherwise classified (HNOC)** None known.

**Supplemental information** None.

## 3. Composition/information on ingredients

### Substances

| Chemical name | Common name and synonyms | CAS number | %   |
|---------------|--------------------------|------------|-----|
| Foots oil     |                          | 64742-67-2 | 100 |

**Composition comments** All concentrations are in percent by weight unless ingredient is a gas. Gas concentrations are in percent by volume.

## 4. First-aid measures

|                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Inhalation</b>                                                             | Solid: No specific first aid measures noted. If fumes from heated product are inhaled: Move to fresh air. Call a POISON CENTER or doctor/physician if you feel unwell.                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Skin contact</b>                                                           | Solid: No specific first aid measures noted. If burned by contact with hot material, cool molten material adhering to skin as quickly as possible with water, and see a physician for removal of adhering material and treatment of burn.                                                                                                                                                                                                                                                                                                                        |
| <b>Eye contact</b>                                                            | Solid: No specific first aid measures noted. Exposure to fumes, vapors or smoke of over heated product can result in irritation of eyes. Direct contact of molten material will cause injury and burns. When handling of molten product eye shield must be worn at all times. If a contact lens is present, DO NOT delay irrigation or attempt to remove the lens. Should an accident occur, flush eyes with generous amounts of water for at least 15 minutes. Administer prompt first aid measures. Get medical attention if irritation develops and persists. |
| <b>Ingestion</b>                                                              | Solid: No specific first aid measures noted. Not acutely toxic by ingestion. If material is ingested, do not induce vomiting. Contact with hot product may cause severe burns. Get medical attention immediately.                                                                                                                                                                                                                                                                                                                                                |
| <b>Most important symptoms/effects, acute and delayed</b>                     | Eye and skin contact: When heated, contact with molten product can cause injury and burns.                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Indication of immediate medical attention and special treatment needed</b> | Provide general supportive measures and treat symptomatically.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>General information</b>                                                    | If you feel unwell, seek medical advice (show the label where possible). Show this safety data sheet to the doctor in attendance.                                                                                                                                                                                                                                                                                                                                                                                                                                |

## 5. Fire-fighting measures

|                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Suitable extinguishing media</b>                                  | Water fog. Foam. Dry chemical powder. Carbon dioxide (CO <sub>2</sub> ).                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Unsuitable extinguishing media</b>                                | Do not use water on molten material: Explosion hazard could result.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Specific hazards arising from the chemical</b>                    | By heating and fire, irritating vapors/gases may be formed. During fire, gases hazardous to health may be formed.                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Special protective equipment and precautions for firefighters</b> | Self-contained breathing apparatus and full protective clothing must be worn in case of fire.                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Fire fighting equipment/instructions</b>                          | In case of fire and/or explosion do not breathe fumes. Cool containers exposed to heat with water spray and remove container, if no risk is involved. Do not direct water at source of leak or safety devices as icing may occur. Use water spray to cool unopened containers. Withdraw immediately in case of rising sound from venting safety device or any discoloration of tanks due to fire. For massive fire in cargo area, use unmanned hose holder or monitor nozzles, if possible. If not, withdraw and let fire burn out. |
| <b>Specific methods</b>                                              | Use standard firefighting procedures and consider the hazards of other involved materials. Move containers from fire area if you can do so without risk. Cool containers exposed to flames with water until well after the fire is out.                                                                                                                                                                                                                                                                                             |
| <b>General fire hazards</b>                                          | No unusual fire or explosion hazards noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

## 6. Accidental release measures

|                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|----------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Personal precautions, protective equipment and emergency procedures</b> | Keep unnecessary personnel away. Do not breathe mist or vapor. Do not touch damaged containers or spilled material unless wearing appropriate protective clothing. Ensure adequate ventilation. For personal protection, see section 8 of the SDS.                                                                                                                                                                                                                                                                                                                                                       |
| <b>Methods and materials for containment and cleaning up</b>               | Handle as a thermoplastic. With molten spills, allow the material to solidify and cool. Keep material out of sewers and watercourses by diking or impounding. Recover and place into appropriate containers for recycling or disposal, according to prevailing local, state and federal laws.<br><br>Large Spills: Stop the flow of material, if this is without risk. Dike the spilled material, where this is possible. Allow material to solidify, and scrape up. Following product recovery, flush area with water.<br><br>Small Spills: Where possible allow molten material to solidify naturally. |
| <b>Environmental precautions</b>                                           | Never return spills to original containers for re-use. For waste disposal, see section 13 of the SDS. Avoid release to the environment. Contact local authorities in case of spillage to drain/aquatic environment. Prevent further leakage or spillage if safe to do so. Do not contaminate water.                                                                                                                                                                                                                                                                                                      |

## 7. Handling and storage

### Precautions for safe handling

When kept in molten state, inert gas blanketing may be used to avoid material degradation. As a solid, avoid contamination by keeping in closed containers. Do not handle until all safety precautions have been read and understood. Heat only in areas with appropriate exhaust ventilation. Do not breathe fume/mist/vapors. Avoid contact with molten material. When using, do not eat, drink or smoke. Observe good industrial hygiene practices. Do not empty into drains. Avoid release to the environment. Wash contaminated clothing before reuse. The material is a solid at room temperature exhibiting elevated temperature softening characteristics. Above its softening point, the material liquefies and flows more readily as the temperature increases. The material may be used as a hot liquid for application purposes and requires caution in handling.

### Conditions for safe storage, including any incompatibilities

Keep away from heat, sparks and open flame. Store in a cool, dry place out of direct sunlight. Store in original tightly closed container. Store in a well-ventilated place. Keep in an area equipped with sprinklers. Store away from incompatible materials (see Section 10 of the SDS). When kept in molten state, inert gas blanketing may be used to avoid material degradation. As a solid, avoid contamination by keeping in closed containers.

## 8. Exposure controls/personal protection

### Occupational exposure limits

No exposure limits noted for ingredient(s).

### Biological limit values

No biological exposure limits noted for the ingredient(s).

### Appropriate engineering controls

Ensure adequate ventilation, especially in confined areas. Eye wash facilities and emergency shower must be available when handling this product.

### Individual protection measures, such as personal protective equipment

#### Eye/face protection

Wear approved safety goggles. Wear a face shield when working with molten material.

#### Skin protection

##### Hand protection

Wear appropriate chemical resistant gloves. Suitable gloves can be recommended by the glove supplier.

#### Skin protection

##### Other

The material may be utilized in molten form. Proper protective splash resistant clothing, thermal gloves, splash resistant shoes, and eye shields must be worn to prevent injury. Use molten material in well ventilated areas. When working in confined areas, use of appropriate respiratory gear is recommended.

#### Respiratory protection

If engineering controls do not maintain airborne concentrations below recommended exposure limits (where applicable) or to an acceptable level (in countries where exposure limits have not been established), an approved respirator must be worn. Use a positive-pressure air-supplied respirator if there is any potential for an uncontrolled release, exposure levels are not known, or any other circumstances where air-purifying respirators may not provide adequate protection.

#### Thermal hazards

Wear appropriate thermal protective clothing, when necessary.

### General hygiene considerations

When using, do not eat, drink or smoke. Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants. Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants.

## 9. Physical and chemical properties

### Appearance

#### Physical state

Solid.

#### Form

Soft solid.

#### Color

Off-white to brown.

### Odor

Petroleum.

### Odor threshold

No data available.

### pH

Not applicable.

### Melting point/freezing point

86 - 194 °F (30 - 90 °C)

### Initial boiling point and boiling range

> 572 °F (> 300 °C)

### Flash point

> 302.0 °F (> 150.0 °C) ASTM D-93

### Evaporation rate

< 0.01 (Butyl acetate = 1)

### Flammability (solid, gas)

Will support a flame above flash point.

## Upper/lower flammability or explosive limits

|                                                |                            |
|------------------------------------------------|----------------------------|
| <b>Flammability limit - lower (%)</b>          | No data available.         |
| <b>Flammability limit - upper (%)</b>          | No data available.         |
| <b>Explosive limit - lower (%)</b>             | 0.9 % v/v                  |
| <b>Explosive limit - upper (%)</b>             | 7 % v/v                    |
| <b>Vapor pressure</b>                          | < 0.01 mm Hg (77 °F/25 °C) |
| <b>Vapor density</b>                           | > 5 (Air = 1)              |
| <b>Relative density</b>                        | 0.85 - 0.92 (77 °F/25 °C)  |
| <b>Solubility(ies)</b>                         |                            |
| <b>Solubility (water)</b>                      | < 0.1 % (68 °F/20 °C)      |
| <b>Partition coefficient (n-octanol/water)</b> | No data available.         |
| <b>Auto-ignition temperature</b>               | No data available.         |
| <b>Decomposition temperature</b>               | No data available.         |
| <b>Viscosity</b>                               | No data available.         |
| <b>Other information</b>                       |                            |
| <b>Partition coefficient (oil/water)</b>       | < 0.01                     |
| <b>Percent volatile</b>                        | < 1 % v/v                  |

## 10. Stability and reactivity

|                                           |                                                                                                                                                                   |
|-------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Reactivity</b>                         | The product is stable and non-reactive under normal conditions of use, storage and transport.                                                                     |
| <b>Chemical stability</b>                 | Material is stable under normal conditions.                                                                                                                       |
| <b>Possibility of hazardous reactions</b> | No dangerous reaction known under conditions of normal use. Hazardous polymerization does not occur.                                                              |
| <b>Conditions to avoid</b>                | Avoid temperatures exceeding the flash point. Contact with incompatible materials.                                                                                |
| <b>Incompatible materials</b>             | Strong oxidizing agents.                                                                                                                                          |
| <b>Hazardous decomposition products</b>   | Decomposition of this product can generate carbon dioxide, carbon monoxide and other products such as aldehydes and ketones depending on conditions of oxidation. |

## 11. Toxicological information

### Information on likely routes of exposure

|                     |                                                                                                                                                                                                   |
|---------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Inhalation</b>   | Not relevant at normal room temperatures. When heated, irritating vapors may be formed. Wax fumes have been reported to be irritating to the respiratory tract, especially to sensitized persons. |
| <b>Skin contact</b> | Health injuries are not known or expected under normal use. Molten material will produce thermal burns.                                                                                           |
| <b>Eye contact</b>  | Health injuries are not known or expected under normal use. Molten material will produce thermal burns.                                                                                           |
| <b>Ingestion</b>    | Health injuries are not known or expected under normal use. Contact with hot material can cause thermal burns which may result in permanent damage.                                               |

**Symptoms related to the physical, chemical and toxicological characteristics** Eye and skin contact: Contact with molten material may cause thermal burns.

### Information on toxicological effects

|                                          |                                                                                                       |
|------------------------------------------|-------------------------------------------------------------------------------------------------------|
| <b>Acute toxicity</b>                    | Not expected to be acutely toxic.                                                                     |
| <b>Skin corrosion/irritation</b>         | Thermal burn hazard - contact with hot material may cause thermal burns.                              |
| <b>Serious eye damage/eye irritation</b> | Not classified. Direct contact of molten product to the eyes will cause thermal burns and eye injury. |
| <b>Respiratory or skin sensitization</b> |                                                                                                       |
| <b>Respiratory sensitization</b>         | Not classified.                                                                                       |
| <b>Skin sensitization</b>                | This product is not expected to cause skin sensitization.                                             |
| <b>Germ cell mutagenicity</b>            | Not classified.                                                                                       |

**Carcinogenicity** Not expected to be hazardous by OSHA criteria.

**IARC Monographs. Overall Evaluation of Carcinogenicity**

Not listed.

**NTP Report on Carcinogens**

Not listed.

**OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)**

Not listed.

**Reproductive toxicity** Not classified.

**Specific target organ toxicity - single exposure** Not classified.

**Specific target organ toxicity - repeated exposure** Not classified.

**Aspiration hazard** Solid product: Not likely, due to the form of the product.

**Chronic effects** Not expected to be hazardous by OSHA criteria. Exposure to vapors, fumes, or smoke from molten material handled in confined areas can produce irritation of respiratory tracts, and possible physical discomfort to sensitive individuals.

**Further information** None.

## 12. Ecological information

**Ecotoxicity** The product is not classified as environmentally hazardous. However, this does not exclude the possibility that large or frequent spills can have a harmful or damaging effect on the environment.

**Persistence and degradability** No data is available on the degradability of this product.

**Bioaccumulative potential** No data available.

**Mobility in soil** The product is insoluble in water.

**Other adverse effects** No other adverse environmental effects (e.g. ozone depletion, photochemical ozone creation potential, endocrine disruption, global warming potential) are expected from this component.

## 13. Disposal considerations

**Disposal instructions** Collect and reclaim or dispose in sealed containers at licensed waste disposal site. Dispose of contents/container in accordance with local/regional/national/international regulations.

**Local disposal regulations** Dispose in accordance with all applicable regulations.

**Hazardous waste code** The waste code should be assigned in discussion between the user, the producer and the waste disposal company.

**Waste from residues / unused products** Dispose of in accordance with local regulations. Empty containers or liners may retain some product residues. This material and its container must be disposed of in a safe manner (see: Disposal instructions).

**Contaminated packaging** Empty containers should be taken to an approved waste handling site for recycling or disposal. Since emptied containers may retain product residue, follow label warnings even after container is emptied.

## 14. Transport information

### DOT

Not regulated as dangerous goods.

### IATA

Not regulated as dangerous goods.

### IMDG

Not regulated as dangerous goods.

**Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code** Not applicable.

**General information** This product is not regulated as dangerous goods for solid. Shipped hot molten product requires a class 9 "HOT" with statement: Elevated temperature material, liquid, N.O.S. 9, UN3257, III (WAX)



| Country(s) or region        | Inventory name                                | On inventory (yes/no)* |
|-----------------------------|-----------------------------------------------|------------------------|
| United States & Puerto Rico | Toxic Substances Control Act (TSCA) Inventory | Yes                    |

\*A "Yes" indicates this product complies with the inventory requirements administered by the governing country(s).

A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

## 16. Other information, including date of preparation or last revision

|               |                                                    |
|---------------|----------------------------------------------------|
| Issue date    | 18-August-2015                                     |
| Revision date | -                                                  |
| Version #     | 01                                                 |
| HMIS® ratings | Health: 1<br>Flammability: 1<br>Physical hazard: 0 |

### NFPA ratings



### Disclaimer

This material safety data sheet is offered for your information only. We believe the statements, technical information and recommendations contained here in are reliable, but are given without warranty or guarantee of any kind, expressed or implied. THE INTERNATIONAL GROUP, INC. assumes no responsibility for any loss, damage or expense, direct or consequential, arising from the use of our material. It is the responsibility of the user to determine the suitability and completeness of such information for the required use or application. We do not assume any legal responsibility for nor do we give permission, inducement or recommendation to practice any patented invention without a license. Further, it is the user's obligation to utilize this material in full compliance with all health, safety and environmental regulations.



**PRODUCT  
NUMBER**

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0201A  
0202C  
0205A  
0205D  
0208A  
0208B  
0211A  
0212A  
0217A  
0218A  
0225A  
0260A  
0260U  
0293A  
R-6429A

## ATTACHMENT I -EMISSIONS UNIT TABLE

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## Attachment I

### Emission Units Table

(includes all emission units and air pollution control devices  
that will be part of this permit application review, regardless of permitting status)

| Emission Unit ID <sup>1</sup> | Emission Point ID <sup>2</sup> | Emission Unit Description    | Year Installed/<br>Modified | Design Capacity | Type <sup>3</sup> and Date of Change | Control Device <sup>4</sup> |
|-------------------------------|--------------------------------|------------------------------|-----------------------------|-----------------|--------------------------------------|-----------------------------|
| 4004                          | TK-4004                        | Floating roof, Gasoline tank | 2018                        | 1,260,000 gal   | Modified                             | N/A                         |
| 4005                          | TK-4005                        | Floating roof, Gasoline tank | 2018                        | 1,260,000 gal   | Modified                             | N/A                         |
| 4006                          | TK-4006                        | Floating roof, Gasoline tank | 2018                        | 1,260,000 gal   | Modified                             | N/A                         |
| 4070                          | TK-4071                        | Floating roof, Gasoline tank | 2018                        | 1,260,000 gal   | New                                  | N/A                         |
| 4071                          | TK-4070                        | Fixed roof, Ethanol tank     | 2018                        | 630,000 gal     | New                                  | N/A                         |
| 4072                          | TK-4072                        | Fixed Roof, Feedstock tank   | 2018                        | 1,260,000 gal   | New                                  | N/A                         |
|                               |                                |                              |                             |                 |                                      |                             |
|                               |                                |                              |                             |                 |                                      |                             |
|                               |                                |                              |                             |                 |                                      |                             |
|                               |                                |                              |                             |                 |                                      |                             |
|                               |                                |                              |                             |                 |                                      |                             |
|                               |                                |                              |                             |                 |                                      |                             |
|                               |                                |                              |                             |                 |                                      |                             |
|                               |                                |                              |                             |                 |                                      |                             |
|                               |                                |                              |                             |                 |                                      |                             |
|                               |                                |                              |                             |                 |                                      |                             |
|                               |                                |                              |                             |                 |                                      |                             |
|                               |                                |                              |                             |                 |                                      |                             |
|                               |                                |                              |                             |                 |                                      |                             |
|                               |                                |                              |                             |                 |                                      |                             |
|                               |                                |                              |                             |                 |                                      |                             |
|                               |                                |                              |                             |                 |                                      |                             |
|                               |                                |                              |                             |                 |                                      |                             |
|                               |                                |                              |                             |                 |                                      |                             |
|                               |                                |                              |                             |                 |                                      |                             |

<sup>1</sup> For Emission Units (or Sources) use the following numbering system: 1S, 2S, 3S,... or other appropriate designation.

<sup>2</sup> For Emission Points use the following numbering system: 1E, 2E, 3E, ... or other appropriate designation.

<sup>3</sup> New, modification, removal

<sup>4</sup> For Control Devices use the following numbering system: 1C, 2C, 3C,... or other appropriate designation.

## ATTACHMENT J - EMISSION POINTS DATA SUMMARY

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**Attachment J  
EMISSION POINTS DATA SUMMARY SHEET**

| Table 1: Emissions Data                                                |                                  |                                                                                          |           |                                                                               |             |                                                          |             |                                                                                         |                                                       |                     |                                                     |            |                                                                                |                               |                                                                     |
|------------------------------------------------------------------------|----------------------------------|------------------------------------------------------------------------------------------|-----------|-------------------------------------------------------------------------------|-------------|----------------------------------------------------------|-------------|-----------------------------------------------------------------------------------------|-------------------------------------------------------|---------------------|-----------------------------------------------------|------------|--------------------------------------------------------------------------------|-------------------------------|---------------------------------------------------------------------|
| Emission Point ID No.<br>(Must match Emission Units Table & Plot Plan) | Emission Point Type <sup>1</sup> | Emission Unit Vented Through This Point<br>(Must match Emission Units Table & Plot Plan) |           | Air Pollution Control Device<br>(Must match Emission Units Table & Plot Plan) |             | Vent Time for Emission Unit<br>(chemical processes only) |             | All Regulated Pollutants - Chemical Name/CAS <sup>3</sup><br><br>(Speciate VOCs & HAPS) | Maximum Potential Uncontrolled Emissions <sup>4</sup> |                     | Maximum Potential Controlled Emissions <sup>5</sup> |            | Emission Form or Phase<br><br>(At exit conditions, Solid, Liquid or Gas/Vapor) | Est. Method Used <sup>6</sup> | Emission Concentration <sup>7</sup><br>(ppmv or mg/m <sup>4</sup> ) |
|                                                                        |                                  | ID No.                                                                                   | Source    | ID No.                                                                        | Device Type | Short Term <sup>2</sup>                                  | Max (hr/yr) |                                                                                         | lb/hr                                                 | ton/yr*             | lb/hr                                               | ton/yr*    |                                                                                |                               |                                                                     |
| TK-4004                                                                | Tank                             | TK-4004                                                                                  | Tank 4004 | N/A                                                                           | N/A         | N/A                                                      | N/A         | VOC<br>Total HAPs                                                                       | --<br>2.12<br>0.48                                    | --<br>2.12<br>0.48  | Gas/Vapor                                           | O<br>AP-42 | N/A                                                                            |                               |                                                                     |
| TK-4005                                                                | Tank                             | TK-4005                                                                                  | Tank 4005 | N/A                                                                           | N/A         | N/A                                                      | N/A         | VOC<br>Total HAPs                                                                       | --<br>2.09<br>0.47                                    | --<br>2.09<br>0.47  | Gas/Vapor                                           | O<br>AP-42 | N/A                                                                            |                               |                                                                     |
| TK-4006                                                                | Tank                             | TK-4006                                                                                  | Tank 4006 | N/A                                                                           | N/A         | N/A                                                      | N/A         | VOC<br>Total HAPs                                                                       | --<br>2.12<br>0.48                                    | --<br>2.12<br>0.48  | Gas/Vapor                                           | O<br>AP-42 | N/A                                                                            |                               |                                                                     |
| TK-4071                                                                | Tank                             | TK-4071                                                                                  | Tank 4071 | N/A                                                                           | N/A         | N/A                                                      | N/A         | VOC<br>Total HAPs                                                                       | --<br>2.12<br>0.48                                    | --<br>2.12<br>0.48  | Gas/Vapor                                           | O<br>AP-42 | N/A                                                                            |                               |                                                                     |
| TK-4070                                                                | Tank                             | TK-4070                                                                                  | Tank 4070 | N/A                                                                           | N/A         | N/A                                                      | N/A         | VOC<br>Total HAPs                                                                       | --<br>0.06<br><0.01                                   | --<br>0.06<br><0.01 | Gas/Vapor                                           | O<br>AP-42 | N/A                                                                            |                               |                                                                     |
| TK-4072                                                                | Tank                             | TK-4072                                                                                  | Tank 4072 | N/A                                                                           | N/A         | N/A                                                      | N/A         | VOC<br>Total HAPs                                                                       | --<br>1.43<br>0.06                                    | --<br>1.43<br>0.06  | Gas/Vapor                                           | O<br>AP-42 | N/A                                                                            |                               |                                                                     |

\*Note, individual tank emissions data is provided for informational purposes only. EWVI is not requesting individual tank emissions limitations. EWVI requests tank emissions limits remain grouped as in the current permit. Suggested updated permit language is attached to this application utilizing the same approach.

The EMISSION POINTS DATA SUMMARY SHEET provides a summation of emissions by emission unit. Note that uncaptured process emission unit emissions are not typically considered to be fugitive and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET. Please note that total emissions from the source are equal to all vented emissions, all fugitive emissions, plus all other emissions (e.g. uncaptured emissions). Please complete the FUGITIVE EMISSIONS DATA SUMMARY SHEET for fugitive emission activities.

- <sup>1</sup> Please add descriptors such as upward vertical stack, downward vertical stack, horizontal stack, relief vent, rain cap, etc.
- <sup>2</sup> Indicate by "C" if venting is continuous. Otherwise, specify the average short-term venting rate with units, for intermittent venting (ie., 15 min/hr). Indicate as many rates as needed to clarify frequency of venting (e.g., 5 min/day, 2 days/wk).
- <sup>3</sup> List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. **LIST** Acids, CO, CS<sub>2</sub>, VOCs, H<sub>2</sub>S, Inorganics, Lead, Organics, O<sub>3</sub>, NO, NO<sub>2</sub>, SO<sub>2</sub>, SO<sub>3</sub>, all applicable Greenhouse Gases (including CO<sub>2</sub> and methane), etc. **DO NOT LIST** H<sub>2</sub>, H<sub>2</sub>O, N<sub>2</sub>, O<sub>2</sub>, and Noble Gases.
- <sup>4</sup> Give maximum potential emission rate with no control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).
- <sup>5</sup> Give maximum potential emission rate with proposed control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).
- <sup>6</sup> Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; O = other (specify).
- <sup>7</sup> Provide for all pollutant emissions. Typically, the units of parts per million by volume (ppmv) are used. If the emission is a mineral acid (sulfuric, nitric, hydrochloric or phosphoric) use units of milligram per dry cubic meter (mg/m<sup>3</sup>) at standard conditions (68 °F and 29.92 inches Hg) (see 45CSR7). If the pollutant is SO<sub>2</sub>, use units of ppmv (See 45CSR10).

**Attachment J  
EMISSION POINTS DATA SUMMARY SHEET**

| Table 2: Release Parameter Data                                   |                      |            |                                                                       |                |                                                      |                                                                                      |                        |          |
|-------------------------------------------------------------------|----------------------|------------|-----------------------------------------------------------------------|----------------|------------------------------------------------------|--------------------------------------------------------------------------------------|------------------------|----------|
| Emission Point ID No.<br><i>(Must match Emission Units Table)</i> | Inner Diameter (ft.) | Exit Gas   |                                                                       |                | Emission Point Elevation (ft)                        |                                                                                      | UTM Coordinates (km) * |          |
|                                                                   |                      | Temp. (°F) | Volumetric Flow <sup>1</sup> (acfm)<br><i>at operating conditions</i> | Velocity (fps) | Ground Level<br><i>(Height above mean sea level)</i> | Stack Height <sup>2</sup><br><i>(Release height of emissions above ground level)</i> | Northing               | Easting  |
| TK-4004                                                           | N/A                  | N/A        | N/A                                                                   | N/A            | 680                                                  | N/A                                                                                  | 531.25                 | 4,495.35 |
| TK-4005                                                           | N/A                  | N/A        | N/A                                                                   | N/A            | 680                                                  | N/A                                                                                  | 531.25                 | 4,495.35 |
| TK-4006                                                           | N/A                  | N/A        | N/A                                                                   | N/A            | 680                                                  | N/A                                                                                  | 531.25                 | 4,495.35 |
| TK-4070                                                           | N/A                  | N/A        | N/A                                                                   | N/A            | 680                                                  | N/A                                                                                  | 531.25                 | 4,495.35 |
| TK-4071                                                           | N/A                  | N/A        | N/A                                                                   | N/A            | 680                                                  | N/A                                                                                  | 531.25                 | 4,495.35 |
| TK-4072                                                           | N/A                  | N/A        | N/A                                                                   | N/A            | 680                                                  | N/A                                                                                  | 531.25                 | 4,495.35 |
|                                                                   |                      |            |                                                                       |                |                                                      |                                                                                      |                        |          |
|                                                                   |                      |            |                                                                       |                |                                                      |                                                                                      |                        |          |
|                                                                   |                      |            |                                                                       |                |                                                      |                                                                                      |                        |          |
|                                                                   |                      |            |                                                                       |                |                                                      |                                                                                      |                        |          |
|                                                                   |                      |            |                                                                       |                |                                                      |                                                                                      |                        |          |
|                                                                   |                      |            |                                                                       |                |                                                      |                                                                                      |                        |          |

\* Coordinates shown are for the facility.

<sup>1</sup> Give at operating conditions. Include inerts.

<sup>2</sup> Release height of emissions above ground level.

## ATTACHMENT L - EMISSIONS UNITS DATA SHEETS

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## Attachment L EMISSIONS UNIT DATA SHEET STORAGE TANKS

Provide the following information for each new or modified bulk liquid storage tank as shown on the *Equipment List Form* and other parts of this application. A tank is considered modified if the material to be stored in the tank is different from the existing stored liquid.

IF USING US EPA'S TANKS EMISSION ESTIMATION PROGRAM (AVAILABLE AT [www.epa.gov/tnn/tanks.html](http://www.epa.gov/tnn/tanks.html)), APPLICANT MAY ATTACH THE SUMMARY SHEETS IN LIEU OF COMPLETING SECTIONS III, IV, & V OF THIS FORM. HOWEVER, SECTIONS I, II, AND VI OF THIS FORM MUST BE COMPLETED. US EPA'S AP-42, SECTION 7.1, "ORGANIC LIQUID STORAGE TANKS," MAY ALSO BE USED TO ESTIMATE VOC AND HAP EMISSIONS (<http://www.epa.gov/tnn/chief/>).

### I. GENERAL INFORMATION (required)

|                                                                                                                                                                                                                                                                                                               |                                                                                                                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|
| 1. Bulk Storage Area Name<br>N/A                                                                                                                                                                                                                                                                              | 2. Tank Name<br>TK-4004, TK-4005, TK-4006                                                                      |
| 3. Tank Equipment Identification No. (as assigned on <i>Equipment List Form</i> )<br>TK-4004, TK-4005, TK-4006                                                                                                                                                                                                | 4. Emission Point Identification No. (as assigned on <i>Equipment List Form</i> )<br>TK-4004, TK-4005, TK-4006 |
| 5. Date of Commencement of Construction (for existing tanks) TK-4004, TK-4005, TK-4006 installed 1971                                                                                                                                                                                                         |                                                                                                                |
| 6. Type of change <input type="checkbox"/> New Construction <input type="checkbox"/> New Stored Material <input checked="" type="checkbox"/> Other Tank Modification                                                                                                                                          |                                                                                                                |
| 7. Description of Tank Modification (if applicable)<br>TK-4004, TK-4005, TK-4006: The tanks will be modified to add eight (8) feet to the shell height. Current shell height is 40 feet and current nominal volume is 24,000 bbl. New shell height will be 48 feet and new nominal volume will be 30,000 bbl. |                                                                                                                |
| 7A. Does the tank have more than one mode of operation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No<br>(e.g. Is there more than one product stored in the tank?)                                                                                                                      |                                                                                                                |
| 7B. If YES, explain and identify which mode is covered by this application (Note: A separate form must be completed for each mode).<br>N/A                                                                                                                                                                    |                                                                                                                |
| 7C. Provide any limitations on source operation affecting emissions, any work practice standards (e.g. production variation, etc.):<br>Condition 7.1.1 limits the throughput for the tank group (gasoline / ethanol).                                                                                         |                                                                                                                |

### II. TANK INFORMATION (required)

|                                                                                                                                                                             |                                                  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| 8. Design Capacity (specify barrels or gallons). Use the internal cross-sectional area multiplied by internal height.<br>30,000 bbl each                                    |                                                  |
| 9A. Tank Internal Diameter (ft)<br>67'                                                                                                                                      | 9B. Tank Internal Height (or Length) (ft)<br>48' |
| 10A. Maximum Liquid Height (ft)                                                                                                                                             | 10B. Average Liquid Height (ft)                  |
| 11A. Maximum Vapor Space Height (ft)<br>N/A                                                                                                                                 | 11B. Average Vapor Space Height (ft)<br>N/A      |
| 12. Nominal Capacity (specify barrels or gallons). This is also known as "working volume" and considers design liquid levels and overflow valve heights.    30,000 bbl each |                                                  |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|
| 13A. Maximum annual throughput (gal/yr)<br>TK-4004, TK-4006, & TK-4071 91,980,000 gal/yr combined<br>TK-4005 – 7,588,350 gal/yr                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 13B. Maximum daily throughput (gal/day)       |
| 14. Number of Turnovers per year (annual net throughput/maximum tank liquid volume)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                               |
| 15. Maximum tank fill rate (gal/min) TK-4004/4006 3.9 and TK-4005 38.9                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                               |
| 16. Tank fill method <input type="checkbox"/> Submerged <input type="checkbox"/> Splash <input checked="" type="checkbox"/> Bottom Loading                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                               |
| 17. Complete 17A and 17B for Variable Vapor Space Tank Systems <input checked="" type="checkbox"/> Does Not Apply                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                               |
| 17A. Volume Expansion Capacity of System (gal)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 17B. Number of transfers into system per year |
| 18. Type of tank (check all that apply):<br><input type="checkbox"/> Fixed Roof    ___ vertical    ___ horizontal    ___ flat roof    ___ cone roof    ___ dome roof<br><input checked="" type="checkbox"/> External Floating Roof <input checked="" type="checkbox"/> pontoon roof    ___ double deck roof<br><input type="checkbox"/> Domed External (or Covered) Floating Roof<br><input type="checkbox"/> Internal Floating Roof    ___ vertical column support    ___ self-supporting<br><input type="checkbox"/> Variable Vapor Space    ___ lifter roof    ___ diaphragm<br><input type="checkbox"/> Pressurized    ___ spherical    ___ cylindrical<br><input type="checkbox"/> Underground<br><input type="checkbox"/> Other (describe) |                                               |

**III. TANK CONSTRUCTION & OPERATION INFORMATION** (optional if providing TANKS Summary Sheets)

|                                                                                                                                                                                                                                                        |                       |                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|------------------------|
| 19. Tank Shell Construction:<br><input type="checkbox"/> Riveted <input type="checkbox"/> Gunitite lined <input type="checkbox"/> Epoxy-coated rivets <input type="checkbox"/> Other (describe)                                                        |                       |                        |
| 20A. Shell Color White                                                                                                                                                                                                                                 | 20B. Roof Color White | 20C. Year Last Painted |
| 21. Shell Condition (if metal and unlined):<br><input type="checkbox"/> No Rust <input checked="" type="checkbox"/> Light Rust <input type="checkbox"/> Dense Rust <input type="checkbox"/> Not applicable                                             |                       |                        |
| 22A. Is the tank heated? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO                                                                                                                                                           |                       |                        |
| 22B. If YES, provide the operating temperature (°F)                                                                                                                                                                                                    |                       |                        |
| 22C. If YES, please describe how heat is provided to tank.                                                                                                                                                                                             |                       |                        |
| 23. Operating Pressure Range (psig):                                                                                                                                                                                                                   |                       |                        |
| 24. Complete the following section for <b>Vertical Fixed Roof Tanks</b> <input checked="" type="checkbox"/> Does Not Apply                                                                                                                             |                       |                        |
| 24A. For dome roof, provide roof radius (ft)                                                                                                                                                                                                           |                       |                        |
| 24B. For cone roof, provide slope (ft/ft)                                                                                                                                                                                                              |                       |                        |
| 25. Complete the following section for <b>Floating Roof Tanks</b> <input type="checkbox"/> Does Not Apply                                                                                                                                              |                       |                        |
| 25A. Year Internal Floaters Installed:                                                                                                                                                                                                                 |                       |                        |
| 25B. Primary Seal Type: <input checked="" type="checkbox"/> Metallic (Mechanical) Shoe Seal <input type="checkbox"/> Liquid Mounted Resilient Seal<br><input type="checkbox"/> Vapor Mounted Resilient Seal <input type="checkbox"/> Other (describe): |                       |                        |
| 25C. Is the Floating Roof equipped with a Secondary Seal? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO                                                                                                                          |                       |                        |
| 25D. If YES, how is the secondary seal mounted? (check one) <input type="checkbox"/> Shoe <input checked="" type="checkbox"/> Rim <input type="checkbox"/> Other (describe):                                                                           |                       |                        |
| 25E. Is the Floating Roof equipped with a weather shield? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO                                                                                                                          |                       |                        |

|                                                                           |                                              |                                              |
|---------------------------------------------------------------------------|----------------------------------------------|----------------------------------------------|
| 25F. Describe deck fittings; indicate the number of each type of fitting: |                                              |                                              |
| ACCESS HATCH                                                              |                                              |                                              |
| BOLT COVER, GASKETED:<br>1                                                | UNBOLTED COVER, GASKETED:                    | UNBOLTED COVER, UNGASKETED:                  |
| AUTOMATIC GAUGE FLOAT WELL                                                |                                              |                                              |
| BOLT COVER, GASKETED:                                                     | UNBOLTED COVER, GASKETED:                    | UNBOLTED COVER, UNGASKETED:                  |
| COLUMN WELL                                                               |                                              |                                              |
| BUILT-UP COLUMN – SLIDING COVER, GASKETED:                                | BUILT-UP COLUMN – SLIDING COVER, UNGASKETED: | PIPE COLUMN – FLEXIBLE FABRIC SLEEVE SEAL:   |
| LADDER WELL                                                               |                                              |                                              |
| PIPE COLUMN – SLIDING COVER, GASKETED:                                    | PIPE COLUMN – SLIDING COVER, UNGASKETED:     |                                              |
| GAUGE-HATCH/SAMPLE PORT                                                   |                                              |                                              |
| SLIDING COVER, GASKETED:                                                  | SLIDING COVER, UNGASKETED:                   |                                              |
| ROOF LEG OR HANGER WELL                                                   |                                              |                                              |
| WEIGHTED MECHANICAL ACTUATION, GASKETED:                                  | WEIGHTED MECHANICAL ACTUATION, UNGASKETED:   | SAMPLE WELL-SLIT FABRIC SEAL (10% OPEN AREA) |
| VACUUM BREAKER                                                            |                                              |                                              |
| WEIGHTED MECHANICAL ACTUATION, GASKETED:<br>1                             | WEIGHTED MECHANICAL ACTUATION, UNGASKETED:   |                                              |
| RIM VENT                                                                  |                                              |                                              |
| WEIGHTED MECHANICAL ACTUATION GASKETED:                                   | WEIGHTED MECHANICAL ACTUATION, UNGASKETED:   |                                              |
| DECK DRAIN (3-INCH DIAMETER)                                              |                                              |                                              |
| OPEN:                                                                     | 90% CLOSED:<br>1                             |                                              |
| STUB DRAIN                                                                |                                              |                                              |
| 1-INCH DIAMETER:                                                          |                                              |                                              |
| OTHER (DESCRIBE, ATTACH ADDITIONAL PAGES IF NECESSARY)                    |                                              |                                              |
| 3 adjustable center area & 8 adjustable pontoon area – ungasketed         |                                              |                                              |

|                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                      |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|
| 26. Complete the following section for <b>Internal Floating Roof Tanks</b> <input checked="" type="checkbox"/> Does Not Apply                                                                                                                                                                                                                                                                                                         |                                      |
| 26A. Deck Type: <input type="checkbox"/> Bolted <input type="checkbox"/> Welded                                                                                                                                                                                                                                                                                                                                                       |                                      |
| 26B. For Bolted decks, provide deck construction:                                                                                                                                                                                                                                                                                                                                                                                     |                                      |
| 26C. Deck seam:<br><input type="checkbox"/> Continuous sheet construction 5 feet wide<br><input type="checkbox"/> Continuous sheet construction 6 feet wide<br><input type="checkbox"/> Continuous sheet construction 7 feet wide<br><input type="checkbox"/> Continuous sheet construction 5 x 7.5 feet wide<br><input type="checkbox"/> Continuous sheet construction 5 x 12 feet wide<br><input type="checkbox"/> Other (describe) |                                      |
| 26D. Deck seam length (ft)                                                                                                                                                                                                                                                                                                                                                                                                            | 26E. Area of deck (ft <sup>2</sup> ) |
| For column supported tanks:                                                                                                                                                                                                                                                                                                                                                                                                           | 26G. Diameter of each column:        |
| 26F. Number of columns:                                                                                                                                                                                                                                                                                                                                                                                                               |                                      |

**IV. SITE INFORMANTION** (optional if providing TANKS Summary Sheets)

|                                                                                               |       |
|-----------------------------------------------------------------------------------------------|-------|
| 27. Provide the city and state on which the data in this section are based.<br>Pittsburgh, PA |       |
| 28. Daily Average Ambient Temperature (°F)                                                    | 50    |
| 29. Annual Average Maximum Temperature (°F)                                                   | 60    |
| 30. Annual Average Minimum Temperature (°F)                                                   | 40    |
| 31. Average Wind Speed (miles/hr)                                                             |       |
| 32. Annual Average Solar Insulation Factor (BTU/(ft <sup>2</sup> ·day))                       |       |
| 33. Atmospheric Pressure (psia)                                                               | 14.17 |

**V. LIQUID INFORMATION** (optional if providing TANKS Summary Sheets)

|                                                                                                                  |                  |                                          |        |
|------------------------------------------------------------------------------------------------------------------|------------------|------------------------------------------|--------|
| 34. Average daily temperature range of bulk liquid:                                                              |                  |                                          |        |
| 34A. Minimum (°F)                                                                                                | 26               | 34B. Maximum (°F)                        | 72     |
| 35. Average operating pressure range of tank:                                                                    |                  |                                          |        |
| 35A. Minimum (psig)                                                                                              |                  | 35B. Maximum (psig)                      |        |
| 36A. Minimum Liquid Surface Temperature (°F)                                                                     | 26               | 36B. Corresponding Vapor Pressure (psia) | 3.5872 |
| 37A. Average Liquid Surface Temperature (°F)                                                                     | 52               | 37B. Corresponding Vapor Pressure (psia) | 6.2050 |
| 38A. Maximum Liquid Surface Temperature (°F)                                                                     | 75               | 38B. Corresponding Vapor Pressure (psia) | 9.0657 |
| 39. Provide the following for <u>each</u> liquid or gas to be stored in tank. Add additional pages if necessary. |                  |                                          |        |
| 39A. Material Name or Composition                                                                                | Gasoline         |                                          |        |
| 39B. CAS Number                                                                                                  | See Attached SDS |                                          |        |
| 39C. Liquid Density (lb/gal)                                                                                     | See Attached SDS |                                          |        |
| 39D. Liquid Molecular Weight (lb/lb-mole)                                                                        | 92               |                                          |        |
| 39E. Vapor Molecular Weight (lb/lb-mole)                                                                         | 62               |                                          |        |



**Attachment L**  
**EMISSIONS UNIT DATA SHEET**  
**STORAGE TANKS**

Provide the following information for each new or modified bulk liquid storage tank as shown on the *Equipment List Form* and other parts of this application. A tank is considered modified if the material to be stored in the tank is different from the existing stored liquid.

IF USING US EPA'S TANKS EMISSION ESTIMATION PROGRAM (AVAILABLE AT [www.epa.gov/tnn/tanks.html](http://www.epa.gov/tnn/tanks.html)), APPLICANT MAY ATTACH THE SUMMARY SHEETS IN LIEU OF COMPLETING SECTIONS III, IV, & V OF THIS FORM. HOWEVER, SECTIONS I, II, AND VI OF THIS FORM MUST BE COMPLETED. US EPA'S AP-42, SECTION 7.1, "ORGANIC LIQUID STORAGE TANKS," MAY ALSO BE USED TO ESTIMATE VOC AND HAP EMISSIONS (<http://www.epa.gov/tnn/chief/>).

**I. GENERAL INFORMATION (required)**

|                                                                                                                                                                                                                       |                                                                                              |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|
| 1. Bulk Storage Area Name<br>N/A                                                                                                                                                                                      | 2. Tank Name<br>TK-4071                                                                      |
| 3. Tank Equipment Identification No. (as assigned on <i>Equipment List Form</i> )<br>TK-4071                                                                                                                          | 4. Emission Point Identification No. (as assigned on <i>Equipment List Form</i> )<br>TK-4071 |
| 5. Date of Commencement of Construction (for existing tanks) NA                                                                                                                                                       |                                                                                              |
| 6. Type of change <input checked="" type="checkbox"/> New Construction <input type="checkbox"/> New Stored Material <input type="checkbox"/> Other Tank Modification                                                  |                                                                                              |
| 7. Description of Tank Modification (if applicable)<br>TK-4071 is a new tank.                                                                                                                                         |                                                                                              |
| 7A. Does the tank have more than one mode of operation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No<br>(e.g. Is there more than one product stored in the tank?)                              |                                                                                              |
| 7B. If YES, explain and identify which mode is covered by this application (Note: A separate form must be completed for each mode).<br>N/A                                                                            |                                                                                              |
| 7C. Provide any limitations on source operation affecting emissions, any work practice standards (e.g. production variation, etc.):<br>Condition 7.1.1 limits the throughput for the tank group (gasoline / ethanol). |                                                                                              |

**II. TANK INFORMATION (required)**

|                                                                                                                                                                        |                                                  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| 8. Design Capacity (specify barrels or gallons). Use the internal cross-sectional area multiplied by internal height.<br>30,000 bbl                                    |                                                  |
| 9A. Tank Internal Diameter (ft)<br>67'                                                                                                                                 | 9B. Tank Internal Height (or Length) (ft)<br>48' |
| 10A. Maximum Liquid Height (ft)                                                                                                                                        | 10B. Average Liquid Height (ft)                  |
| 11A. Maximum Vapor Space Height (ft)<br>N/A                                                                                                                            | 11B. Average Vapor Space Height (ft)<br>N/A      |
| 12. Nominal Capacity (specify barrels or gallons). This is also known as "working volume" and considers design liquid levels and overflow valve heights.    30,000 bbl |                                                  |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|
| 13A. Maximum annual throughput (gal/yr)<br>TK-4004, TK-4006, & TK-4071 91,980,000 ga/yr combined                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 13B. Maximum daily throughput (gal/day)       |
| 14. Number of Turnovers per year (annual net throughput/maximum tank liquid volume)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                               |
| 15. Maximum tank fill rate (gal/min)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                               |
| 16. Tank fill method <input type="checkbox"/> Submerged <input type="checkbox"/> Splash <input checked="" type="checkbox"/> Bottom Loading                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                               |
| 17. Complete 17A and 17B for Variable Vapor Space Tank Systems <input checked="" type="checkbox"/> Does Not Apply                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                               |
| 17A. Volume Expansion Capacity of System (gal)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 17B. Number of transfers into system per year |
| 18. Type of tank (check all that apply):<br><input type="checkbox"/> Fixed Roof    ___ vertical    ___ horizontal    ___ flat roof    ___ cone roof    ___ dome roof<br><input checked="" type="checkbox"/> External Floating Roof <input checked="" type="checkbox"/> pontoon roof    ___ double deck roof<br><input type="checkbox"/> Domed External (or Covered) Floating Roof<br><input type="checkbox"/> Internal Floating Roof    ___ vertical column support    ___ self-supporting<br><input type="checkbox"/> Variable Vapor Space    ___ lifter roof    ___ diaphragm<br><input type="checkbox"/> Pressurized    ___ spherical    ___ cylindrical<br><input type="checkbox"/> Underground<br><input type="checkbox"/> Other (describe) |                                               |

**III. TANK CONSTRUCTION & OPERATION INFORMATION** (optional if providing TANKS Summary Sheets)

|                                                                                                                                                                                                                                                                    |                       |                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|------------------------|
| 19. Tank Shell Construction:<br><input type="checkbox"/> Riveted <input type="checkbox"/> Gunitite lined <input type="checkbox"/> Epoxy-coated rivets <input type="checkbox"/> Other (describe)                                                                    |                       |                        |
| 20A. Shell Color White                                                                                                                                                                                                                                             | 20B. Roof Color White | 20C. Year Last Painted |
| 21. Shell Condition (if metal and unlined):<br><input type="checkbox"/> No Rust <input type="checkbox"/> Light Rust <input type="checkbox"/> Dense Rust <input checked="" type="checkbox"/> Not applicable                                                         |                       |                        |
| 22A. Is the tank heated? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO                                                                                                                                                                       |                       |                        |
| 22B. If YES, provide the operating temperature (°F)                                                                                                                                                                                                                |                       |                        |
| 22C. If YES, please describe how heat is provided to tank.                                                                                                                                                                                                         |                       |                        |
| 23. Operating Pressure Range (psig):                                                                                                                                                                                                                               |                       |                        |
| 24. Complete the following section for <b>Vertical Fixed Roof Tanks</b> <input checked="" type="checkbox"/> Does Not Apply                                                                                                                                         |                       |                        |
| 24A. For dome roof, provide roof radius (ft)                                                                                                                                                                                                                       |                       |                        |
| 24B. For cone roof, provide slope (ft/ft)                                                                                                                                                                                                                          |                       |                        |
| 25. Complete the following section for <b>Floating Roof Tanks</b> <input type="checkbox"/> Does Not Apply                                                                                                                                                          |                       |                        |
| 25A. Year Internal Floaters Installed:                                                                                                                                                                                                                             |                       |                        |
| 25B. Primary Seal Type: <input checked="" type="checkbox"/> Metallic (Mechanical) Shoe Seal <input type="checkbox"/> Liquid Mounted Resilient Seal<br>(check one) <input type="checkbox"/> Vapor Mounted Resilient Seal <input type="checkbox"/> Other (describe): |                       |                        |
| 25C. Is the Floating Roof equipped with a Secondary Seal? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO                                                                                                                                      |                       |                        |
| 25D. If YES, how is the secondary seal mounted? (check one) <input type="checkbox"/> Shoe <input checked="" type="checkbox"/> Rim <input type="checkbox"/> Other (describe):                                                                                       |                       |                        |
| 25E. Is the Floating Roof equipped with a weather shield? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO                                                                                                                                      |                       |                        |

|                                                                           |                                              |                                              |
|---------------------------------------------------------------------------|----------------------------------------------|----------------------------------------------|
| 25F. Describe deck fittings; indicate the number of each type of fitting: |                                              |                                              |
| ACCESS HATCH                                                              |                                              |                                              |
| BOLT COVER, GASKETED:<br>1                                                | UNBOLTED COVER, GASKETED:                    | UNBOLTED COVER, UNGASKETED:                  |
| AUTOMATIC GAUGE FLOAT WELL                                                |                                              |                                              |
| BOLT COVER, GASKETED:                                                     | UNBOLTED COVER, GASKETED:                    | UNBOLTED COVER, UNGASKETED:                  |
| COLUMN WELL                                                               |                                              |                                              |
| BUILT-UP COLUMN – SLIDING COVER, GASKETED:                                | BUILT-UP COLUMN – SLIDING COVER, UNGASKETED: | PIPE COLUMN – FLEXIBLE FABRIC SLEEVE SEAL:   |
| LADDER WELL                                                               |                                              |                                              |
| PIPE COLUMN – SLIDING COVER, GASKETED:                                    | PIPE COLUMN – SLIDING COVER, UNGASKETED:     |                                              |
| GAUGE-HATCH/SAMPLE PORT                                                   |                                              |                                              |
| SLIDING COVER, GASKETED:                                                  | SLIDING COVER, UNGASKETED:                   |                                              |
| ROOF LEG OR HANGER WELL                                                   |                                              |                                              |
| WEIGHTED MECHANICAL ACTUATION, GASKETED:                                  | WEIGHTED MECHANICAL ACTUATION, UNGASKETED:   | SAMPLE WELL-SLIT FABRIC SEAL (10% OPEN AREA) |
| VACUUM BREAKER                                                            |                                              |                                              |
| WEIGHTED MECHANICAL ACTUATION, GASKETED:<br>1                             | WEIGHTED MECHANICAL ACTUATION, UNGASKETED:   |                                              |
| RIM VENT                                                                  |                                              |                                              |
| WEIGHTED MECHANICAL ACTUATION GASKETED:                                   | WEIGHTED MECHANICAL ACTUATION, UNGASKETED:   |                                              |
| DECK DRAIN (3-INCH DIAMETER)                                              |                                              |                                              |
| OPEN:                                                                     | 90% CLOSED:<br>1                             |                                              |
| STUB DRAIN                                                                |                                              |                                              |
| 1-INCH DIAMETER:                                                          |                                              |                                              |
| OTHER (DESCRIBE, ATTACH ADDITIONAL PAGES IF NECESSARY)                    |                                              |                                              |
| 3 adjustable center area & 8 adjustable pontoon area – ungasketed         |                                              |                                              |



|                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                      |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|
| 26. Complete the following section for <b>Internal Floating Roof Tanks</b> <input checked="" type="checkbox"/> Does Not Apply                                                                                                                                                                                                                                                                                                         |                                      |
| 26A. Deck Type: <input type="checkbox"/> Bolted <input type="checkbox"/> Welded                                                                                                                                                                                                                                                                                                                                                       |                                      |
| 26B. For Bolted decks, provide deck construction:                                                                                                                                                                                                                                                                                                                                                                                     |                                      |
| 26C. Deck seam:<br><input type="checkbox"/> Continuous sheet construction 5 feet wide<br><input type="checkbox"/> Continuous sheet construction 6 feet wide<br><input type="checkbox"/> Continuous sheet construction 7 feet wide<br><input type="checkbox"/> Continuous sheet construction 5 x 7.5 feet wide<br><input type="checkbox"/> Continuous sheet construction 5 x 12 feet wide<br><input type="checkbox"/> Other (describe) |                                      |
| 26D. Deck seam length (ft)                                                                                                                                                                                                                                                                                                                                                                                                            | 26E. Area of deck (ft <sup>2</sup> ) |
| For column supported tanks:                                                                                                                                                                                                                                                                                                                                                                                                           | 26G. Diameter of each column:        |
| 26F. Number of columns:                                                                                                                                                                                                                                                                                                                                                                                                               |                                      |

**IV. SITE INFORMATION** (optional if providing TANKS Summary Sheets)

|                                                                                               |       |
|-----------------------------------------------------------------------------------------------|-------|
| 27. Provide the city and state on which the data in this section are based.<br>Pittsburgh, PA |       |
| 28. Daily Average Ambient Temperature (°F)                                                    | 50    |
| 29. Annual Average Maximum Temperature (°F)                                                   | 60    |
| 30. Annual Average Minimum Temperature (°F)                                                   | 40    |
| 31. Average Wind Speed (miles/hr)                                                             |       |
| 32. Annual Average Solar Insulation Factor (BTU/(ft <sup>2</sup> ·day))                       |       |
| 33. Atmospheric Pressure (psia)                                                               | 14.17 |

**V. LIQUID INFORMATION** (optional if providing TANKS Summary Sheets)

|                                                                                                                  |                  |                                          |        |
|------------------------------------------------------------------------------------------------------------------|------------------|------------------------------------------|--------|
| 34. Average daily temperature range of bulk liquid:                                                              |                  |                                          |        |
| 34A. Minimum (°F)                                                                                                | 26               | 34B. Maximum (°F)                        | 72     |
| 35. Average operating pressure range of tank:                                                                    |                  |                                          |        |
| 35A. Minimum (psig)                                                                                              |                  | 35B. Maximum (psig)                      |        |
| 36A. Minimum Liquid Surface Temperature (°F)                                                                     | 26               | 36B. Corresponding Vapor Pressure (psia) | 3.5872 |
| 37A. Average Liquid Surface Temperature (°F)                                                                     | 52               | 37B. Corresponding Vapor Pressure (psia) | 6.2050 |
| 38A. Maximum Liquid Surface Temperature (°F)                                                                     | 75               | 38B. Corresponding Vapor Pressure (psia) | 9.0657 |
| 39. Provide the following for <u>each</u> liquid or gas to be stored in tank. Add additional pages if necessary. |                  |                                          |        |
| 39A. Material Name or Composition                                                                                | Gasoline         |                                          |        |
| 39B. CAS Number                                                                                                  | See Attached SDS |                                          |        |
| 39C. Liquid Density (lb/gal)                                                                                     | See Attached SDS |                                          |        |
| 39D. Liquid Molecular Weight (lb/lb-mole)                                                                        | 92               |                                          |        |
| 39E. Vapor Molecular Weight (lb/lb-mole)                                                                         | 62               |                                          |        |



**Attachment L**  
**EMISSIONS UNIT DATA SHEET**  
**STORAGE TANKS**

Provide the following information for each new or modified bulk liquid storage tank as shown on the *Equipment List Form* and other parts of this application. A tank is considered modified if the material to be stored in the tank is different from the existing stored liquid.

IF USING US EPA'S TANKS EMISSION ESTIMATION PROGRAM (AVAILABLE AT [www.epa.gov/tnn/tanks.html](http://www.epa.gov/tnn/tanks.html)), APPLICANT MAY ATTACH THE SUMMARY SHEETS IN LIEU OF COMPLETING SECTIONS III, IV, & V OF THIS FORM. HOWEVER, SECTIONS I, II, AND VI OF THIS FORM MUST BE COMPLETED. US EPA'S AP-42, SECTION 7.1, "ORGANIC LIQUID STORAGE TANKS," MAY ALSO BE USED TO ESTIMATE VOC AND HAP EMISSIONS (<http://www.epa.gov/tnn/chief/>).

**I. GENERAL INFORMATION (required)**

|                                                                                                                                                                                                                       |                                                                                              |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|
| 1. Bulk Storage Area Name<br>N/A                                                                                                                                                                                      | 2. Tank Name<br>TK-4070                                                                      |
| 3. Tank Equipment Identification No. (as assigned on <i>Equipment List Form</i> )<br>TK-4070                                                                                                                          | 4. Emission Point Identification No. (as assigned on <i>Equipment List Form</i> )<br>TK-4070 |
| 5. Date of Commencement of Construction (for existing tanks)                                                                                                                                                          |                                                                                              |
| 6. Type of change <input checked="" type="checkbox"/> New Construction <input type="checkbox"/> New Stored Material <input type="checkbox"/> Other Tank Modification                                                  |                                                                                              |
| 7. Description of Tank Modification (if applicable)                                                                                                                                                                   |                                                                                              |
| 7A. Does the tank have more than one mode of operation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No<br>(e.g. Is there more than one product stored in the tank?)                              |                                                                                              |
| 7B. If YES, explain and identify which mode is covered by this application (Note: A separate form must be completed for each mode).<br>N/A                                                                            |                                                                                              |
| 7C. Provide any limitations on source operation affecting emissions, any work practice standards (e.g. production variation, etc.):<br>Condition 7.1.1 limits the throughput for the tank group (gasoline / ethanol). |                                                                                              |

**II. TANK INFORMATION (required)**

|                                                                                                                                                                         |                                                  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| 8. Design Capacity (specify barrels or gallons). Use the internal cross-sectional area multiplied by internal height.<br>15,000 bbl.                                    |                                                  |
| 9A. Tank Internal Diameter (ft)<br>48'                                                                                                                                  | 9B. Tank Internal Height (or Length) (ft)<br>48' |
| 10A. Maximum Liquid Height (ft)<br>42' 8.5"                                                                                                                             | 10B. Average Liquid Height (ft)<br>21' 4"        |
| 11A. Maximum Vapor Space Height (ft)<br>N/A                                                                                                                             | 11B. Average Vapor Space Height (ft)<br>N/A      |
| 12. Nominal Capacity (specify barrels or gallons). This is also known as "working volume" and considers design liquid levels and overflow valve heights.    15,000 bbl. |                                                  |

|                                                                                                                                            |                                               |
|--------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|
| 13A. Maximum annual throughput (gal/yr)<br>6,647,159 gal/yr                                                                                | 13B. Maximum daily throughput (gal/day)       |
| 14. Number of Turnovers per year (annual net throughput/maximum tank liquid volume)<br>10.6                                                |                                               |
| 15. Maximum tank fill rate (gal/min) 36.4                                                                                                  |                                               |
| 16. Tank fill method <input type="checkbox"/> Submerged <input type="checkbox"/> Splash <input checked="" type="checkbox"/> Bottom Loading |                                               |
| 17. Complete 17A and 17B for Variable Vapor Space Tank Systems <input checked="" type="checkbox"/> Does Not Apply                          |                                               |
| 17A. Volume Expansion Capacity of System (gal)                                                                                             | 17B. Number of transfers into system per year |

18. Type of tank (check all that apply):

Fixed Roof \_\_\_ vertical \_\_\_ horizontal \_\_\_ flat roof \_\_\_ cone roof \_\_\_ dome roof  
\_\_\_ other (describe)

External Floating Roof pontoon roof \_\_\_ double deck roof

Domed External (or Covered) Floating Roof

Internal Floating Roof  vertical column support \_\_\_ self-supporting

Variable Vapor Space \_\_\_ lifter roof \_\_\_ diaphragm

Pressurized \_\_\_ spherical \_\_\_ cylindrical

Underground

Other (describe)

**III. TANK CONSTRUCTION & OPERATION INFORMATION** (optional if providing TANKS Summary Sheets)

|                                                                                                                                                                                                                                                                    |                       |                                                    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|----------------------------------------------------|
| 19. Tank Shell Construction:<br><input type="checkbox"/> Riveted <input type="checkbox"/> Gunitite lined <input type="checkbox"/> Epoxy-coated rivets <input type="checkbox"/> Other (describe)                                                                    |                       |                                                    |
| 20A. Shell Color White                                                                                                                                                                                                                                             | 20B. Roof Color White | 20C. Year Last Painted N/A                         |
| 21. Shell Condition (if metal and unlined):<br><input type="checkbox"/> No Rust <input type="checkbox"/> Light Rust <input type="checkbox"/> Dense Rust <input checked="" type="checkbox"/> Not applicable                                                         |                       |                                                    |
| 22A. Is the tank heated? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO                                                                                                                                                                       |                       |                                                    |
| 22B. If YES, provide the operating temperature (°F)                                                                                                                                                                                                                |                       |                                                    |
| 22C. If YES, please describe how heat is provided to tank.                                                                                                                                                                                                         |                       |                                                    |
| 23. Operating Pressure Range (psig): -0.03 to 0.03                                                                                                                                                                                                                 |                       |                                                    |
| 24. Complete the following section for <b>Vertical Fixed Roof Tanks</b>                                                                                                                                                                                            |                       | <input checked="" type="checkbox"/> Does Not Apply |
| 24A. For dome roof, provide roof radius (ft)                                                                                                                                                                                                                       |                       |                                                    |
| 24B. For cone roof, provide slope (ft/ft)                                                                                                                                                                                                                          |                       |                                                    |
| 25. Complete the following section for <b>Floating Roof Tanks</b>                                                                                                                                                                                                  |                       | <input type="checkbox"/> Does Not Apply            |
| 25A. Year Internal Floaters Installed: TBD                                                                                                                                                                                                                         |                       |                                                    |
| 25B. Primary Seal Type: <input checked="" type="checkbox"/> Metallic (Mechanical) Shoe Seal <input type="checkbox"/> Liquid Mounted Resilient Seal<br>(check one) <input type="checkbox"/> Vapor Mounted Resilient Seal <input type="checkbox"/> Other (describe): |                       |                                                    |
| 25C. Is the Floating Roof equipped with a Secondary Seal? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO                                                                                                                                      |                       |                                                    |
| 25D. If YES, how is the secondary seal mounted? (check one) <input type="checkbox"/> Shoe <input checked="" type="checkbox"/> Rim <input type="checkbox"/> Other (describe):                                                                                       |                       |                                                    |
| 25E. Is the Floating Roof equipped with a weather shield? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO                                                                                                                                      |                       |                                                    |

|                                                                              |                                              |                                              |
|------------------------------------------------------------------------------|----------------------------------------------|----------------------------------------------|
| 25F. Describe deck fittings; indicate the number of each type of fitting:    |                                              |                                              |
| ACCESS HATCH                                                                 |                                              |                                              |
| BOLT COVER, GASKETED:<br>1                                                   | UNBOLTED COVER, GASKETED:                    | UNBOLTED COVER, UNGASKETED:                  |
| AUTOMATIC GAUGE FLOAT WELL                                                   |                                              |                                              |
| BOLT COVER, GASKETED:                                                        | UNBOLTED COVER, GASKETED:                    | UNBOLTED COVER, UNGASKETED:                  |
| COLUMN WELL                                                                  |                                              |                                              |
| BUILT-UP COLUMN – SLIDING COVER, GASKETED:<br>1                              | BUILT-UP COLUMN – SLIDING COVER, UNGASKETED: | PIPE COLUMN – FLEXIBLE FABRIC SLEEVE SEAL:   |
| LADDER WELL                                                                  |                                              |                                              |
| PIPE COLUMN – SLIDING COVER, GASKETED:<br>1                                  | PIPE COLUMN – SLIDING COVER, UNGASKETED:     |                                              |
| GAUGE-HATCH/SAMPLE PORT                                                      |                                              |                                              |
| SLIDING COVER, GASKETED:<br>1                                                | SLIDING COVER, UNGASKETED:                   |                                              |
| ROOF LEG OR HANGER WELL                                                      |                                              |                                              |
| WEIGHTED MECHANICAL ACTUATION, GASKETED:                                     | WEIGHTED MECHANICAL ACTUATION, UNGASKETED:   | SAMPLE WELL-SLIT FABRIC SEAL (10% OPEN AREA) |
| VACUUM BREAKER                                                               |                                              |                                              |
| WEIGHTED MECHANICAL ACTUATION, GASKETED:<br>1                                | WEIGHTED MECHANICAL ACTUATION, UNGASKETED:   |                                              |
| RIM VENT                                                                     |                                              |                                              |
| WEIGHTED MECHANICAL ACTUATION GASKETED:                                      | WEIGHTED MECHANICAL ACTUATION, UNGASKETED:   |                                              |
| DECK DRAIN (3-INCH DIAMETER)                                                 |                                              |                                              |
| OPEN:                                                                        | 90% CLOSED:                                  |                                              |
| STUB DRAIN                                                                   |                                              |                                              |
| 1-INCH DIAMETER:                                                             |                                              |                                              |
| OTHER (DESCRIBE, ATTACH ADDITIONAL PAGES IF NECESSARY)                       |                                              |                                              |
| Roof Leg – 4 center area adjustable & 5 pontoon area adjustable - ungasketed |                                              |                                              |

|                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                      |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|
| 26. Complete the following section for <b>Internal Floating Roof Tanks</b> <input type="checkbox"/> Does Not Apply                                                                                                                                                                                                                                                                                                                    |                                      |
| 26A. Deck Type: <input type="checkbox"/> Bolted <input checked="" type="checkbox"/> Welded                                                                                                                                                                                                                                                                                                                                            |                                      |
| 26B. For Bolted decks, provide deck construction:                                                                                                                                                                                                                                                                                                                                                                                     |                                      |
| 26C. Deck seam:<br><input type="checkbox"/> Continuous sheet construction 5 feet wide<br><input type="checkbox"/> Continuous sheet construction 6 feet wide<br><input type="checkbox"/> Continuous sheet construction 7 feet wide<br><input type="checkbox"/> Continuous sheet construction 5 x 7.5 feet wide<br><input type="checkbox"/> Continuous sheet construction 5 x 12 feet wide<br><input type="checkbox"/> Other (describe) |                                      |
| 26D. Deck seam length (ft)                                                                                                                                                                                                                                                                                                                                                                                                            | 26E. Area of deck (ft <sup>2</sup> ) |
| For column supported tanks:                                                                                                                                                                                                                                                                                                                                                                                                           | 26G. Diameter of each column:        |
| 26F. Number of columns:    1                                                                                                                                                                                                                                                                                                                                                                                                          | 1                                    |

**IV. SITE INFORMATION** (optional if providing TANKS Summary Sheets)

|                                                                                               |       |
|-----------------------------------------------------------------------------------------------|-------|
| 27. Provide the city and state on which the data in this section are based.<br>Pittsburgh, PA |       |
| 28. Daily Average Ambient Temperature (°F)                                                    | 50    |
| 29. Annual Average Maximum Temperature (°F)                                                   | 60    |
| 30. Annual Average Minimum Temperature (°F)                                                   | 40    |
| 31. Average Wind Speed (miles/hr)                                                             |       |
| 32. Annual Average Solar Insulation Factor (BTU/(ft <sup>2</sup> ·day))                       |       |
| 33. Atmospheric Pressure (psia)                                                               | 14.17 |

**V. LIQUID INFORMATION** (optional if providing TANKS Summary Sheets)

|                                                                                                                  |                        |                                          |        |
|------------------------------------------------------------------------------------------------------------------|------------------------|------------------------------------------|--------|
| 34. Average daily temperature range of bulk liquid:                                                              |                        |                                          |        |
| 34A. Minimum (°F)                                                                                                | 26                     | 34B. Maximum (°F)                        | 72     |
| 35. Average operating pressure range of tank:                                                                    |                        |                                          |        |
| 35A. Minimum (psig)                                                                                              |                        | 35B. Maximum (psig)                      |        |
| 36A. Minimum Liquid Surface Temperature (°F)                                                                     | 27                     | 36B. Corresponding Vapor Pressure (psia) | 0.2464 |
| 37A. Average Liquid Surface Temperature (°F)                                                                     | 52                     | 37B. Corresponding Vapor Pressure (psia) | 0.6708 |
| 38A. Maximum Liquid Surface Temperature (°F)                                                                     | 75                     | 38B. Corresponding Vapor Pressure (psia) | 1.2188 |
| 39. Provide the following for <u>each</u> liquid or gas to be stored in tank. Add additional pages if necessary. |                        |                                          |        |
| 39A. Material Name or Composition                                                                                | Ethanol                |                                          |        |
| 39B. CAS Number                                                                                                  | 64-17-5                |                                          |        |
| 39C. Liquid Density (lb/gal)                                                                                     | Specific Gravity 0.789 |                                          |        |
| 39D. Liquid Molecular Weight (lb/lb-mole)                                                                        | 47.1                   |                                          |        |
| 39E. Vapor Molecular Weight (lb/lb-mole)                                                                         | 51.2                   |                                          |        |



**Attachment L**  
**EMISSIONS UNIT DATA SHEET**  
**STORAGE TANKS**

Provide the following information for each new or modified bulk liquid storage tank as shown on the *Equipment List Form* and other parts of this application. A tank is considered modified if the material to be stored in the tank is different from the existing stored liquid.

IF USING US EPA'S TANKS EMISSION ESTIMATION PROGRAM (AVAILABLE AT [www.epa.gov/tnn/tanks.html](http://www.epa.gov/tnn/tanks.html)), APPLICANT MAY ATTACH THE SUMMARY SHEETS IN LIEU OF COMPLETING SECTIONS III, IV, & V OF THIS FORM. HOWEVER, SECTIONS I, II, AND VI OF THIS FORM MUST BE COMPLETED. US EPA'S AP-42, SECTION 7.1, "ORGANIC LIQUID STORAGE TANKS," MAY ALSO BE USED TO ESTIMATE VOC AND HAP EMISSIONS (<http://www.epa.gov/tnn/chief/>).

**I. GENERAL INFORMATION (required)**

|                                                                                                                                                                                                                       |                                                                                              |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|
| 1. Bulk Storage Area Name<br>N/A                                                                                                                                                                                      | 2. Tank Name<br>TK-4072                                                                      |
| 3. Tank Equipment Identification No. (as assigned on <i>Equipment List Form</i> )<br>TK-4072                                                                                                                          | 4. Emission Point Identification No. (as assigned on <i>Equipment List Form</i> )<br>TK-4072 |
| 5. Date of Commencement of Construction (for existing tanks) NA                                                                                                                                                       |                                                                                              |
| 6. Type of change <input checked="" type="checkbox"/> New Construction <input type="checkbox"/> New Stored Material <input type="checkbox"/> Other Tank Modification                                                  |                                                                                              |
| 7. Description of Tank Modification (if applicable)<br>TK-4072 is a new tank.                                                                                                                                         |                                                                                              |
| 7A. Does the tank have more than one mode of operation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No<br>(e.g. Is there more than one product stored in the tank?)                              |                                                                                              |
| 7B. If YES, explain and identify which mode is covered by this application (Note: A separate form must be completed for each mode).<br>N/A                                                                            |                                                                                              |
| 7C. Provide any limitations on source operation affecting emissions, any work practice standards (e.g. production variation, etc.):<br>Condition 7.1.1 limits the throughput for the tank group (gasoline / ethanol). |                                                                                              |

**II. TANK INFORMATION (required)**

|                                                                                                                                                                        |                                                  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| 8. Design Capacity (specify barrels or gallons). Use the internal cross-sectional area multiplied by internal height.<br>30,000 bbl                                    |                                                  |
| 9A. Tank Internal Diameter (ft)<br>70'                                                                                                                                 | 9B. Tank Internal Height (or Length) (ft)<br>48' |
| 10A. Maximum Liquid Height (ft)                                                                                                                                        | 10B. Average Liquid Height (ft)                  |
| 11A. Maximum Vapor Space Height (ft)<br>N/A                                                                                                                            | 11B. Average Vapor Space Height (ft)<br>N/A      |
| 12. Nominal Capacity (specify barrels or gallons). This is also known as "working volume" and considers design liquid levels and overflow valve heights.    30,000 bbl |                                                  |



|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                               |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|
| 13A. Maximum annual throughput (gal/yr)<br>TK-4000, TK-4001, TK-4060, TK-4061, and TK-4072<br>802,264,890 ga/yr combined                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 13B. Maximum daily throughput (gal/day)       |
| 14. Number of Turnovers per year (annual net throughput/maximum tank liquid volume)<br>17.75                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                               |
| 15. Maximum tank fill rate (gal/min)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                               |
| 16. Tank fill method <input type="checkbox"/> Submerged <input type="checkbox"/> Splash <input checked="" type="checkbox"/> Bottom Loading                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                               |
| 17. Complete 17A and 17B for Variable Vapor Space Tank Systems <input checked="" type="checkbox"/> Does Not Apply                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                               |
| 17A. Volume Expansion Capacity of System (gal)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 17B. Number of transfers into system per year |
| 18. Type of tank (check all that apply):<br><input checked="" type="checkbox"/> Fixed Roof <input checked="" type="checkbox"/> vertical      ___ horizontal    ___ flat roof      ___ cone roof      ___ dome roof<br><input type="checkbox"/> External Floating Roof <input checked="" type="checkbox"/> pontoon roof      ___ double deck roof<br><input type="checkbox"/> Domed External (or Covered) Floating Roof<br><input type="checkbox"/> Internal Floating Roof      ___ vertical column support      ___ self-supporting<br><input type="checkbox"/> Variable Vapor Space      ___ lifter roof      ___ diaphragm<br><input type="checkbox"/> Pressurized      ___ spherical      ___ cylindrical<br><input type="checkbox"/> Underground<br><input type="checkbox"/> Other (describe) |                                               |

**III. TANK CONSTRUCTION & OPERATION INFORMATION** (optional if providing TANKS Summary Sheets)

|                                                                                                                                                                                                                                                                    |                       |                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|------------------------|
| 19. Tank Shell Construction:<br><input type="checkbox"/> Riveted <input type="checkbox"/> Gunitite lined <input type="checkbox"/> Epoxy-coated rivets <input type="checkbox"/> Other (describe)                                                                    |                       |                        |
| 20A. Shell Color White                                                                                                                                                                                                                                             | 20B. Roof Color White | 20C. Year Last Painted |
| 21. Shell Condition (if metal and unlined):<br><input type="checkbox"/> No Rust <input type="checkbox"/> Light Rust <input type="checkbox"/> Dense Rust <input checked="" type="checkbox"/> Not applicable                                                         |                       |                        |
| 22A. Is the tank heated? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO                                                                                                                                                                       |                       |                        |
| 22B. If YES, provide the operating temperature (°F)    170 F                                                                                                                                                                                                       |                       |                        |
| 22C. If YES, please describe how heat is provided to tank.                                                                                                                                                                                                         |                       |                        |
| 23. Operating Pressure Range (psig):                                                                                                                                                                                                                               |                       |                        |
| 24. Complete the following section for <b>Vertical Fixed Roof Tanks</b> <input type="checkbox"/> Does Not Apply                                                                                                                                                    |                       |                        |
| 24A. For dome roof, provide roof radius (ft)                                                                                                                                                                                                                       |                       |                        |
| 24B. For cone roof, provide slope (ft/ft)    0.0625                                                                                                                                                                                                                |                       |                        |
| 25. Complete the following section for <b>Floating Roof Tanks</b> <input checked="" type="checkbox"/> Does Not Apply                                                                                                                                               |                       |                        |
| 25A. Year Internal Floaters Installed:                                                                                                                                                                                                                             |                       |                        |
| 25B. Primary Seal Type: <input checked="" type="checkbox"/> Metallic (Mechanical) Shoe Seal <input type="checkbox"/> Liquid Mounted Resilient Seal<br>(check one) <input type="checkbox"/> Vapor Mounted Resilient Seal <input type="checkbox"/> Other (describe): |                       |                        |
| 25C. Is the Floating Roof equipped with a Secondary Seal? <input type="checkbox"/> YES <input type="checkbox"/> NO                                                                                                                                                 |                       |                        |
| 25D. If YES, how is the secondary seal mounted? (check one) <input type="checkbox"/> Shoe <input type="checkbox"/> Rim <input type="checkbox"/> Other (describe):                                                                                                  |                       |                        |
| 25E. Is the Floating Roof equipped with a weather shield? <input type="checkbox"/> YES <input type="checkbox"/> NO                                                                                                                                                 |                       |                        |

|                                                                           |                                              |                                              |
|---------------------------------------------------------------------------|----------------------------------------------|----------------------------------------------|
| 25F. Describe deck fittings; indicate the number of each type of fitting: |                                              |                                              |
| ACCESS HATCH                                                              |                                              |                                              |
| BOLT COVER, GASKETED:                                                     | UNBOLTED COVER, GASKETED:                    | UNBOLTED COVER, UNGASKETED:                  |
| AUTOMATIC GAUGE FLOAT WELL                                                |                                              |                                              |
| BOLT COVER, GASKETED:                                                     | UNBOLTED COVER, GASKETED:                    | UNBOLTED COVER, UNGASKETED:                  |
| COLUMN WELL                                                               |                                              |                                              |
| BUILT-UP COLUMN – SLIDING COVER, GASKETED:                                | BUILT-UP COLUMN – SLIDING COVER, UNGASKETED: | PIPE COLUMN – FLEXIBLE FABRIC SLEEVE SEAL:   |
| LADDER WELL                                                               |                                              |                                              |
| PIPE COLUMN – SLIDING COVER, GASKETED:                                    | PIPE COLUMN – SLIDING COVER, UNGASKETED:     |                                              |
| GAUGE-HATCH/SAMPLE PORT                                                   |                                              |                                              |
| SLIDING COVER, GASKETED:                                                  | SLIDING COVER, UNGASKETED:                   |                                              |
| ROOF LEG OR HANGER WELL                                                   |                                              |                                              |
| WEIGHTED MECHANICAL ACTUATION, GASKETED:                                  | WEIGHTED MECHANICAL ACTUATION, UNGASKETED:   | SAMPLE WELL-SLIT FABRIC SEAL (10% OPEN AREA) |
| VACUUM BREAKER                                                            |                                              |                                              |
| WEIGHTED MECHANICAL ACTUATION, GASKETED:                                  | WEIGHTED MECHANICAL ACTUATION, UNGASKETED:   |                                              |
| RIM VENT                                                                  |                                              |                                              |
| WEIGHTED MECHANICAL ACTUATION GASKETED:                                   | WEIGHTED MECHANICAL ACTUATION, UNGASKETED:   |                                              |
| DECK DRAIN (3-INCH DIAMETER)                                              |                                              |                                              |
| OPEN:                                                                     | 90% CLOSED:                                  |                                              |
| STUB DRAIN                                                                |                                              |                                              |
| 1-INCH DIAMETER:                                                          |                                              |                                              |
| OTHER (DESCRIBE, ATTACH ADDITIONAL PAGES IF NECESSARY)                    |                                              |                                              |

|                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                      |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|
| 26. Complete the following section for <b>Internal Floating Roof Tanks</b> <input checked="" type="checkbox"/> Does Not Apply                                                                                                                                                                                                                                                                                                         |                                      |
| 26A. Deck Type: <input type="checkbox"/> Bolted <input type="checkbox"/> Welded                                                                                                                                                                                                                                                                                                                                                       |                                      |
| 26B. For Bolted decks, provide deck construction:                                                                                                                                                                                                                                                                                                                                                                                     |                                      |
| 26C. Deck seam:<br><input type="checkbox"/> Continuous sheet construction 5 feet wide<br><input type="checkbox"/> Continuous sheet construction 6 feet wide<br><input type="checkbox"/> Continuous sheet construction 7 feet wide<br><input type="checkbox"/> Continuous sheet construction 5 x 7.5 feet wide<br><input type="checkbox"/> Continuous sheet construction 5 x 12 feet wide<br><input type="checkbox"/> Other (describe) |                                      |
| 26D. Deck seam length (ft)                                                                                                                                                                                                                                                                                                                                                                                                            | 26E. Area of deck (ft <sup>2</sup> ) |
| For column supported tanks:                                                                                                                                                                                                                                                                                                                                                                                                           | 26G. Diameter of each column:        |
| 26F. Number of columns:                                                                                                                                                                                                                                                                                                                                                                                                               |                                      |

**IV. SITE INFORMANTION** (optional if providing TANKS Summary Sheets)

|                                                                                               |       |
|-----------------------------------------------------------------------------------------------|-------|
| 27. Provide the city and state on which the data in this section are based.<br>Pittsburgh, PA |       |
| 28. Daily Average Ambient Temperature (°F)                                                    | 50    |
| 29. Annual Average Maximum Temperature (°F)                                                   |       |
| 30. Annual Average Minimum Temperature (°F)                                                   |       |
| 31. Average Wind Speed (miles/hr)                                                             |       |
| 32. Annual Average Solar Insulation Factor (BTU/(ft <sup>2</sup> ·day))                       |       |
| 33. Atmospheric Pressure (psia)                                                               | 14.17 |

**V. LIQUID INFORMATION** (optional if providing TANKS Summary Sheets)

|                                                                                                                  |                                          |        |  |
|------------------------------------------------------------------------------------------------------------------|------------------------------------------|--------|--|
| 34. Average daily temperature range of bulk liquid:                                                              |                                          |        |  |
| 34A. Minimum (°F)                                                                                                | 34B. Maximum (°F)                        | 170    |  |
| 35. Average operating pressure range of tank:                                                                    |                                          |        |  |
| 35A. Minimum (psig)                                                                                              | 35B. Maximum (psig)                      |        |  |
| 36A. Minimum Liquid Surface Temperature (°F)                                                                     | 36B. Corresponding Vapor Pressure (psia) | 3.5872 |  |
| 37A. Average Liquid Surface Temperature (°F)                                                                     | 37B. Corresponding Vapor Pressure (psia) | 6.2050 |  |
| 38A. Maximum Liquid Surface Temperature (°F)                                                                     | 38B. Corresponding Vapor Pressure (psia) | 9.0657 |  |
| 170                                                                                                              |                                          |        |  |
| 39. Provide the following for <u>each</u> liquid or gas to be stored in tank. Add additional pages if necessary. |                                          |        |  |
| 39A. Material Name or Composition                                                                                | Feed stock                               |        |  |
| 39B. CAS Number                                                                                                  | NA                                       |        |  |
| 39C. Liquid Density (lb/gal)                                                                                     |                                          |        |  |
| 39D. Liquid Molecular Weight (lb/lb-mole)                                                                        | 387                                      |        |  |
| 39E. Vapor Molecular Weight (lb/lb-mole)                                                                         | 190                                      |        |  |



## ATTACHMENT N - CALCULATIONS

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**Summary Table**  
 Current Limits Proposed Permit Limits  
 ERGON - West Virginia, Inc., Newell Refinery

| Pollutants | Current Limits<br>R30-02900008-2015 MM02 and MM03 |       |             |       |               |       | Proposed Limits  |       |             |       |               |       | Increased Potential<br>Discharge<br>(Proposed Limit - Current<br>Limit) |
|------------|---------------------------------------------------|-------|-------------|-------|---------------|-------|------------------|-------|-------------|-------|---------------|-------|-------------------------------------------------------------------------|
|            | TLOAD & OXIDIZER                                  |       | MLD & MLDOX |       | STORAGE TANKS |       | TLOAD & OXIDIZER |       | MLD & MLDOX |       | STORAGE TANKS |       |                                                                         |
|            | TPM                                               | TPY   | TPM         | TPY   | TPM           | TPY   | TPM              | TPY   | TPM         | TPY   | TPM           | TPY   | TPY                                                                     |
| CO         | 0.20                                              | 1.98  | 0.27        | 2.63  | NA            | NA    | 0.21             | 2.12  | 0.29        | 2.92  | NA            | NA    | 0.43                                                                    |
| NOx        | 0.04                                              | 0.36  | 0.05        | 0.48  | NA            | NA    | 0.04             | 0.39  | 0.05        | 0.54  | NA            | NA    | 0.09                                                                    |
| PM2.5      | 0.01                                              | 0.04  | 0.01        | 0.05  | NA            | NA    | 0.00             | 0.04  | 0.01        | 0.06  | NA            | NA    | 0.01                                                                    |
| PM10       | 0.01                                              | 0.04  | 0.01        | 0.05  | NA            | NA    | 0.00             | 0.04  | 0.01        | 0.06  | NA            | NA    | 0.01                                                                    |
| PM         | 0.01                                              | 0.04  | 0.01        | 0.05  | NA            | NA    | 0.00             | 0.04  | 0.01        | 0.06  | NA            | NA    | 0.01                                                                    |
| SO2        | 0.02                                              | 1.16  | 0.08        | 0.72  | NA            | NA    | 0.13             | 1.26  | 0.19        | 1.85  | NA            | NA    | 1.23                                                                    |
| VOC        | 1.57                                              | 15.77 | 1.09        | 10.86 | 5.39          | 53.87 | 1.82             | 18.17 | 1.22        | 12.24 | 5.79          | 57.85 | 7.76                                                                    |
| Total HAP  | 0.27                                              | 2.68  | 0.11        | 1.05  | 0.65          | 6.54  | 0.32             | 3.22  | 0.13        | 1.30  | 0.65          | 6.54  | 0.79                                                                    |
| Benzene    | 0.03                                              | 0.26  | 0.01        | 0.05  | 0.08          | 0.81  | 0.03             | 0.32  | 0.01        | 0.08  | 0.08          | 0.81  | 0.09                                                                    |

**Storage Tanks**  
PTE Estimated Emissions  
ERGON - West Virginia, Inc., Newell Refinery

| Product                 | Tank No.                 | Working Capacity (gal) | Revised April 2018 |                    |                        |                    |                    |                    |                    |                    |                    |                    |
|-------------------------|--------------------------|------------------------|--------------------|--------------------|------------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|
|                         |                          |                        | Estimated Tank     | Estimated          | Total                  | Benezene           | Hexane             | Iso-Octane         | Toluene            | Ethylbenzene       | Xylene             | Isopropyl Benzene  |
|                         |                          |                        | Throughput (gal)   | Turnovers          | VOC Emissions (ton/yr) | Emissions (ton/yr) | Emissions (ton/yr) | Emissions (ton/yr) | Emissions (ton/yr) | Emissions (ton/yr) | Emissions (ton/yr) | Emissions (ton/yr) |
| Crude/Charge            | 4000                     | 2,310,000              | 114,975,000        | 49.8               | 1.470                  | 0.009              | 0.006              | 0.001              | 0.015              | 0.006              | 0.021              | 0.001              |
|                         | 4001                     | 2,310,000              | 114,975,000        | 49.8               | 1.470                  | 0.009              | 0.006              | 0.001              | 0.015              | 0.006              | 0.021              | 0.001              |
|                         | 4060                     | 4,540,000              | 176,295,000        | 38.8               | 2.210                  | 0.013              | 0.009              | 0.002              | 0.022              | 0.009              | 0.031              | 0.002              |
|                         | 4061                     | 5,040,000              | 176,295,000        | 35.0               | 2.210                  | 0.013              | 0.009              | 0.002              | 0.022              | 0.009              | 0.031              | 0.002              |
|                         | 4062                     | 5,040,000              | 153,300,000        | 30.4               | 12.270                 | 0.074              | 0.750              | Neg                | 0.064              | 0.007              | 0.092              | 0.002              |
|                         | 4063                     | 5,040,000              | 153,300,000        | 30.4               | 12.270                 | 0.074              | 0.750              | Neg                | 0.064              | 0.007              | 0.092              | 0.002              |
|                         | 4072                     | 1,260,000              | 23,000,000         | 18.3               | 1.430                  | 0.009              | 0.006              | 0.001              | 0.014              | 0.006              | 0.020              | 0.001              |
|                         | <b>Totals for Group</b>  |                        | <b>24,280,000</b>  | <b>889,140,000</b> |                        | <b>33.330</b>      | <b>0.200</b>       | <b>1.529</b>       | <b>0.007</b>       | <b>0.201</b>       | <b>0.043</b>       | <b>0.287</b>       |
| Gasoline <sup>(1)</sup> | 4004                     | 1,050,000              | 32,850,000         | 31.3               | 2.121                  | 0.038              | 0.021              | 0.085              | 0.148              | 0.030              | 0.148              | 0.011              |
|                         | 4005                     | 1,050,000              | 8,130,375          | 7.7                | 2.086                  | 0.038              | 0.021              | 0.083              | 0.146              | 0.029              | 0.146              | 0.010              |
|                         | 4006                     | 1,050,000              | 32,850,000         | 31.3               | 2.121                  | 0.038              | 0.021              | 0.085              | 0.148              | 0.030              | 0.148              | 0.011              |
|                         | 4071                     | 1,260,000              | 32,850,000         | 26.1               | 2.121                  | 0.038              | 0.021              | 0.085              | 0.148              | 0.030              | 0.148              | 0.011              |
|                         | 4070                     | 630,000                | 7,121,956          | 11.3               | 0.058                  | 0.000              | 0.000              | 0.000              | 0.000              | 0.000              | 0.000              | 0.000              |
|                         | 4012                     | 630,000                | 65,152,500         | 103.4              | 1.697                  | 0.031              | 0.017              | 0.068              | 0.119              | 0.024              | 0.119              | 0.008              |
|                         | 4013                     | 630,000                | 65,152,500         | 103.4              | 1.767                  | 0.032              | 0.018              | 0.071              | 0.124              | 0.025              | 0.124              | 0.009              |
|                         | 4014                     | 315,000                | 32,348,971         | 102.7              | 1.557                  | 0.028              | 0.016              | 0.062              | 0.109              | 0.022              | 0.109              | 0.008              |
|                         | 4015                     | 315,000                | 29,939,300         | 95.0               | 1.551                  | 0.028              | 0.016              | 0.062              | 0.109              | 0.022              | 0.109              | 0.008              |
|                         | 4016                     | 315,000                | 2,025,000          | 6.4                | 1.479                  | 0.027              | 0.015              | 0.059              | 0.104              | 0.021              | 0.104              | 0.007              |
|                         | 4050                     | 630,000                | 7,121,956          | 11.3               | 0.058                  | 0.001              | 0.001              | 0.002              | 0.004              | 0.001              | 0.004              | 0.000              |
|                         | 4052                     | 30,240                 | 2,258,438          | 74.7               | 0.602                  | 0.001              | 0.000              | 0.001              | 0.002              | 0.000              | 0.002              | 0.000              |
|                         | 4053                     | 30,240                 | 2,258,438          | 74.7               | 0.602                  | 0.001              | 0.000              | 0.001              | 0.002              | 0.000              | 0.002              | 0.000              |
|                         | <b>Totals for Group</b>  |                        | <b>320,059,433</b> |                    | <b>17.820</b>          | <b>0.298</b>       | <b>0.166</b>       | <b>0.662</b>       | <b>1.159</b>       | <b>0.232</b>       | <b>1.159</b>       | <b>0.083</b>       |
|                         | Heavy Product / Kerosene | 4002                   | 2,310,000          | 102,200,000        | 44.2                   | 0.140              | 0.0000             | 0.0000             | Neg                | 0.0002             | 0.0002             | 0.0004             |
| 4003                    |                          | 2,310,000              | 134,904,000        | 58.4               | 0.183                  | 0.0000             | 0.0000             | Neg                | 0.0002             | 0.0002             | 0.0006             | 0.0000             |
| 4009                    |                          | 1,260,000              | 44,457,000         | 35.3               | 1.996                  | 0.0001             | 0.0001             | Neg                | 0.0026             | 0.0025             | 0.0062             | 0.0000             |
| 4011                    |                          | 1,260,000              | 44,457,000         | 35.3               | 1.996                  | 0.0001             | 0.0001             | Neg                | 0.0026             | 0.0025             | 0.0062             | 0.0000             |
| 4054                    |                          | 625,000                | 7,665,000          | 12.3               | 0.344                  | 0.0000             | 0.0000             | Neg                | 0.0004             | 0.0004             | 0.0011             | 0.0000             |
| 4055                    |                          | 625,000                | 7,665,000          | 12.3               | 0.344                  | 0.0000             | 0.0000             | Neg                | 0.0004             | 0.0004             | 0.0011             | 0.0000             |
| 4056                    |                          | 625,000                | 16,863,000         | 27.0               | 0.734                  | 0.0000             | 0.0000             | Neg                | 0.0010             | 0.0009             | 0.0023             | 0.0000             |
| 4057                    |                          | 625,000                | 16,863,000         | 27.0               | 0.734                  | 0.0000             | 0.0000             | Neg                | 0.0010             | 0.0009             | 0.0023             | 0.0000             |
| <b>Totals for Group</b> |                          |                        | <b>375,074,000</b> |                    | <b>6.330</b>           | <b>0.000</b>       | <b>0.000</b>       | <b>0.000</b>       | <b>0.008</b>       | <b>0.008</b>       | <b>0.020</b>       | <b>0.000</b>       |
| Heavy Products          | 4007                     | 2,310,000              | 25,677,750         | 11.1               | 0.011                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|                         | 4008                     | 1,260,000              | 19,545,750         | 15.5               | 0.001                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|                         | 4010                     | 1,260,000              | 19,545,750         | 15.5               | 0.001                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|                         | 4017                     | 840,000                | 51,738,750         | 61.6               | 0.014                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|                         | 4018                     | 704,970                | 25,677,750         | 36.4               | 0.011                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|                         | 4019                     | 704,970                | 42,924,000         | 60.9               | 0.012                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|                         | 4020                     | 840,000                | 41,391,000         | 49.3               | 0.014                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|                         | 4021                     | 840,000                | 41,391,000         | 49.3               | 0.014                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|                         | 4022                     | 571,200                | 10,347,750         | 18.1               | 0.004                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|                         | 4023                     | 571,200                | 31,043,250         | 54.3               | 0.009                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|                         | 4024                     | 840,000                | 18,242,700         | 21.7               | 0.008                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|                         | 4025                     | 840,000                | 18,242,700         | 21.7               | 0.008                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|                         | 4026                     | 840,000                | 10,424,000         | 12.4               | 0.004                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|                         | 4027                     | 840,000                | 32,959,500         | 39.2               | 0.013                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|                         | 4028 <sup>(2)</sup>      | 210,000                | 1,981,478          | 9.4                | 0.089                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0003             | 0.0000             |
|                         | 4029                     | 65,100                 | 1,500,000          | 23.0               | 0.001                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|                         | 4030                     | 65,100                 | 1,500,000          | 23.0               | 0.001                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|                         | 4031                     | 315,000                | 8,814,750          | 28.0               | 0.004                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|                         | 4032                     | 315,000                | 8,814,750          | 28.0               | 0.004                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|                         | 4033                     | 315,000                | 5,212,200          | 16.5               | 0.002                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
| 4034 <sup>(2)</sup>     | 840,000                  | 7,925,911              | 9.4                | 0.003              | 0.0000                 | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |                    |
| 4035                    | 840,000                  | 21,845,250             | 26.0               | 0.009              | 0.0000                 | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |                    |

**Storage Tanks**  
PTE Estimated Emissions  
ERGON - West Virginia, Inc., Newell Refinery

| Product | Tank No.                | Working Capacity (gal) | Revised April 2018 |           |                        |                    |                    |                    |                    |                    |                    |                    |
|---------|-------------------------|------------------------|--------------------|-----------|------------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|
|         |                         |                        | Estimated Tank     | Estimated | Total                  | Benezene           | Hexane             | Iso-Octane         | Toluene            | Ethylbenzene       | Xylene             | Isopropyl Benzene  |
|         |                         |                        | Throughput (gal)   | Turnovers | VOC Emissions (ton/yr) | Emissions (ton/yr) | Emissions (ton/yr) | Emissions (ton/yr) | Emissions (ton/yr) | Emissions (ton/yr) | Emissions (ton/yr) | Emissions (ton/yr) |
|         | 4036                    | 315,000                | 2,299,000          | 7.3       | 0.001                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|         | 4037                    | 315,000                | 2,299,000          | 7.3       | 0.001                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|         | 4038                    | 840,000                | 21,845,250         | 26.0      | 0.009                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|         | 4039                    | 1,260,000              | 32,959,500         | 26.2      | 0.014                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|         | 4040 <sup>(3)</sup>     |                        |                    |           | 0.010                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|         | 4041                    | 630,000                | 7,560,000          | 12.0      | 0.003                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|         | 4042 <sup>(3)</sup>     |                        |                    |           | 0.010                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|         | 4043 <sup>(3)</sup>     |                        |                    |           | 0.010                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|         | 4044 <sup>(3)</sup>     |                        |                    |           | 0.010                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|         | 4045 <sup>(3)</sup>     |                        |                    |           | 0.010                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|         | 4046 <sup>(3)</sup>     |                        |                    |           | 0.010                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|         | 4047 <sup>(3)</sup>     |                        |                    |           | 0.010                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|         | 4048                    | 504,000                | 8,431,500          | 16.7      | 0.004                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|         | 4051                    | 1,260,000              | 10,347,750         | 8.2       | 0.004                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|         | 4065                    |                        | 15,330,000         |           | 0.007                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|         | 4103                    | 127,000                | 1,500,000          |           | 0.010                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|         | 4104                    | 127,000                | 1,500,000          |           | 0.010                  | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             |
|         | <b>Totals for Group</b> |                        | <b>550,817,989</b> |           | <b>0.371</b>           | <b>0.0000</b>      | <b>0.0000</b>      | <b>0.0000</b>      | <b>0.0001</b>      | <b>0.0000</b>      | <b>0.0011</b>      | <b>0.0000</b>      |
|         | <b>Totals</b>           |                        |                    |           | <b>57.851</b>          | <b>0.498</b>       | <b>1.695</b>       | <b>0.670</b>       | <b>1.369</b>       | <b>0.283</b>       | <b>1.467</b>       | <b>0.095</b>       |

**Notes:**

- All straight run gasoline produced from the Crude Distillation Unit goes through 4012 or 4013. However the amount of gasoline presented is post-Platformer. Assumed approx. 80% yield from Platformer Unit. Thus the potential production amount was increased by about 25% and split equally between 4012 and 4013. Conservatively assumed 6 turnovers in 4016 during operation turnarounds. Assumed 100% of gasoline routed to 4014 and 4015 as reformulated gasoline batch adjustment and sampling. Assumed 100% of the gasoline was stored in sales tanks 4004 and 4006 prior to load out. Premium gasoline is barged into the plant and stored in 4005 prior to loading. Historically the amount is about 10% of gasoline sold.
- Tanks 4028 and 4034 store recovered oil; however, light end constituents have been removed so these products are now equivalent to other heavy products.
- Tanks are in heavy product service and are leased to Quaker State. Conservatively assumed 0.01 tons/yr emissions
- Neg. = Negligible amount of benzene in product.
- HAP Emissions (ton/yr) = (Total VOCs) x (HAP Vapor Weight %)

| Product           | Benzene Vapor Weight % | Hexane Vapor Weight % | Iso-Octane Vapor Weight % | Toluene Vapor Weight % | Ethylbenzene Vapor Weight % | Xylene Vapor Weight % | Isopropyl Benzene Vapor Weight % |
|-------------------|------------------------|-----------------------|---------------------------|------------------------|-----------------------------|-----------------------|----------------------------------|
| Gasoline          | 1.8                    | 1                     | 4                         | 7                      | 1.4                         | 7                     | 0.5                              |
| Penn Crude        | 0.6                    | 0.4                   | 0.1                       | 1                      | 0.4                         | 1.4                   | 0.1                              |
| HVY Products/Kero | 0.004                  | 0.005                 |                           | 0.13                   | 0.127                       | 0.31                  |                                  |
| ALS Crude         | 0.08                   | 6.11                  |                           | 0.52                   | 0.055                       | 0.75                  | 0.02                             |
| HVY Products      | 0.0008                 | 0.0001                |                           | 0.032                  | 0.013                       | 0.29                  |                                  |



**Truck Loading**  
PTE Estimated Emissions  
ERGON - West Virginia, Inc., Newell Refinery

**Loading Area Emissions**

| Location                       | Product             | Quantity       | Max loading rate | Loading Losses <sup>1</sup> | VOC Emissions |              | Benzene | Benzene Emissions |              |
|--------------------------------|---------------------|----------------|------------------|-----------------------------|---------------|--------------|---------|-------------------|--------------|
|                                |                     | Mgal/yr        | Mgal/min         | lb/Mgal                     | lb/hr         | tpy          | Wt %    | lb/hr             | tpy          |
| TLOAD                          | Diesel <sup>2</sup> | 134,904        | 0.75             | 1.30E-02                    | 0.586         | 0.878        | 0.00%   | 0.00              | 0.000        |
|                                | Gasoline            | 116,752        | 0.75             | 4.85E+00                    | 2.835         | 3.678        | 1.80%   | 0.05              | 0.066        |
|                                | No. 6 Fuel Oil      | 13,650         | 0.75             | 1.23E-03                    | 0.055         | 0.008        | 0.00%   | 0.00              | 0.000        |
|                                | Kerosene            | 15,330         | 0.75             | 1.23E-02                    | 0.553         | 0.094        | 0.00%   | 0.00              | 0.000        |
|                                | Lube Oil            | 136,920        | 0.75             | 2.23E-03                    | 0.100         | 0.152        | 0.17%   | 0.00              | 0.000        |
| <b>TLOAD Loading Emissions</b> |                     | <b>417,556</b> |                  |                             | <b>4.129</b>  | <b>4.210</b> |         | <b>0.05</b>       | <b>0.066</b> |

<sup>1</sup>The emissions at the Truck Loading area are controlled by a thermal oxidizer, Factors are taken for AP-42 ch. 5.2. Capture efficiency of 98.7% can be used for truck loading when the trucks are tightness tested at least annually.

<sup>2</sup>Throughputs changed for these products.

| Loading Losses (AP-42 ch. 5.2) |            |          |         | Eqn. L=12.46(SPM/T)*C |             |          |             |          |          |
|--------------------------------|------------|----------|---------|-----------------------|-------------|----------|-------------|----------|----------|
| Diesel                         |            | Gasoline |         | No.6 Fuel Oil         |             | Kerosene |             | Lube Oil |          |
| S                              | 0.5        | S        | 0.5     | S                     | 1.45        | S        | 0.5         | S        | 0.5      |
| P                              | 0.009      | P        | 6.6     | P                     | 0.0002      | P        | 0.0085      | P        | 0.001    |
| M                              | 130        | M        | 66      | M                     | 190         | M        | 130         | M        | 200      |
| T                              | 560        | T        | 560     | T                     | 560         | T        | 560         | T        | 560      |
| C                              | 1          | C        | 1       | C                     | 1           | C        | 1           | C        | 1        |
| L                              | 0.01301625 | L        | 4.84605 | L                     | 0.001225975 | L        | 0.012293125 | L        | 0.002225 |

S= saturation factor (ch. 5.2)

P= True Vapor Pressure of liquid loaded (psia) (ch 7.1)

M= molecular weight of vapors (lb/lb-mole) (ch 7.1)

T= temperature of bulk liquid loaded ( R)

C= control efficiency

**Truck Loading**  
PTE Estimated Emissions  
ERGON - West Virginia, Inc., Newell Refinery

**Loading Area Emissions - TLOAD**

| Hexane | Hexane Emissions |              | Toluene | Toluene Emissions |              | Ethylbenzene | Ethylbenzene Emissions |              | Xylene | Xylene Emissions |              |
|--------|------------------|--------------|---------|-------------------|--------------|--------------|------------------------|--------------|--------|------------------|--------------|
|        | Wt %             | lb/hr        |         | tpy               | Wt %         |              | lb/hr                  | tpy          |        | Wt %             | lb/hr        |
| 0.01%  | 0.000            | 0.000        | 0.13%   | 0.001             | 0.001        | 0.13%        | 0.001                  | 0.001        | 0.31%  | 0.002            | 0.003        |
| 1.00%  | 0.028            | 0.037        | 7.00%   | 0.198             | 0.257        | 1.40%        | 0.040                  | 0.051        | 7.00%  | 0.198            | 0.257        |
| 0.01%  | 0.000            | 0.000        | 0.13%   | 0.000             | 0.000        | 0.13%        | 0.000                  | 0.000        | 0.31%  | 0.000            | 0.000        |
| 0.01%  | 0.000            | 0.000        | 0.13%   | 0.001             | 0.000        | 0.13%        | 0.001                  | 0.000        | 0.31%  | 0.002            | 0.000        |
| 0.40%  | 0.000            | 0.001        | 1.00%   | 0.001             | 0.002        | 0.40%        | 0.000                  | 0.001        | 1.40%  | 0.001            | 0.002        |
|        |                  | <b>0.037</b> |         | <b>0.201</b>      | <b>0.260</b> |              | <b>0.042</b>           | <b>0.053</b> |        | <b>0.204</b>     | <b>0.263</b> |

**Truck Loading - Thermal Oxidizer**  
PTE Estimated Emissions  
ERGON - West Virginia, Inc., Newell Refinery

**Loading Area Emissions**

| Location | Product  | Quantity | Max Loading | Loading Losses <sup>1</sup> | VOC Emissions |              | Benzene | Benzene Emissions |              |
|----------|----------|----------|-------------|-----------------------------|---------------|--------------|---------|-------------------|--------------|
|          |          | Mgal/yr  | Mgal/min    | lb/Mgal                     | lb/hr         | tpy          | Wt %    | lb/hr             | tpy          |
| OXIDIZER | Gasoline | 116,752  | 0.75        | 2.42E-01                    | 10.76         | 13.96        | 1.80%   | 0.19              | 0.251        |
|          |          |          |             |                             | <b>10.76</b>  | <b>13.96</b> |         | <b>0.19</b>       | <b>0.251</b> |

<sup>1</sup>The emissions at the Truck Loading area are controlled by a thermal oxidizer, Factors are taken for AP-42 ch. 5.2.

Capture efficiency of 98.7% can be used for truck loading when the trucks are tightness tested at least annually.

<sup>2</sup>Throughputs changed for these products.

| Loading Losses (AP-42 ch. 5.2) |           |
|--------------------------------|-----------|
| Eqn. $L=12.46(SPM/T)*C$        |           |
| Gasoline                       |           |
| S                              | 0.5       |
| P                              | 6.6       |
| M                              | 66        |
| T                              | 560       |
| C                              | 0.05      |
| $L_{(uncontrolled)}$           | 4.84605   |
| $L_{(controlled)}$             | 0.2423025 |

S= saturation factor (ch. 5.2)

P= True Vapor Pressure of liquid loaded (psia) (ch 7.1)

M= molecular weight of vapors (lb/lb-mole) (ch 7.1)

T= temperature of bulk liquid loaded ( R)

C= control efficiency

| Truck Thermal Oxidizer                     | Total Product Combusted (lbs/yr) | Heat Value of Product (Btu/lb) <sup>(c)</sup> | Heat Ratings (MMBtu/hr) | Total Energy Combusted (MMBtu/yr) |
|--------------------------------------------|----------------------------------|-----------------------------------------------|-------------------------|-----------------------------------|
| Product Inputs (lbs)                       |                                  |                                               |                         |                                   |
| <b>Thermal Oxidizer</b>                    |                                  |                                               |                         |                                   |
| Natural Gas (enriching gas) <sup>(a)</sup> | 43,223                           | 20,267                                        | 0.10                    | 876                               |
| Natural Gas (pilot gas) <sup>(a)</sup>     | 64,834                           | 20,267                                        | 0.15                    | 1,314                             |
| Gasoline Loading Losses <sup>(b)</sup>     | 463,765                          | 18,352                                        | 0.20                    | 8,511                             |
| total:                                     | 571,822                          |                                               | 0.45                    | 10,701                            |

| Pollutants                        | Emission Factors (lb/MMBtu)      | Thermal Oxidizer Est. Emissions (ton/yr) | Thermal Oxidizer Est. Emissions (lb/hr) | Global Warming Potential |
|-----------------------------------|----------------------------------|------------------------------------------|-----------------------------------------|--------------------------|
| <b>Thermal Oxidizer</b>           |                                  |                                          |                                         |                          |
| NO <sub>x</sub>                   | 0.068                            | 0.36                                     | 0.08                                    |                          |
| CO                                | 0.370                            | 1.98                                     | 0.45                                    |                          |
| SO <sub>2</sub>                   | 0.005 lb SO <sub>2</sub> /lb HCV | 1.16                                     | 0.26                                    |                          |
| VOC                               | 5% of Uncombusted VOC            | 13.96                                    | 10.76                                   |                          |
| PM                                | 0.007                            | 0.04                                     | 0.002                                   |                          |
| PM <sub>10</sub>                  | 0.007                            | 0.04                                     | 0.009                                   |                          |
| PM <sub>2.5</sub> <sup>(d)</sup>  | 100% of PM <sub>10</sub>         | 0.04                                     | 0.009                                   |                          |
| CO <sub>2e</sub>                  | Totals                           | 630.78                                   | 52.76                                   |                          |
| CO <sub>2</sub>                   | 117.65                           | 629.49                                   | 52.65                                   | 1                        |
| N <sub>2</sub> O (Low NOx Burner) | 6.27E-04                         | 1.04                                     | 0.09                                    | 310                      |
| CH <sub>4</sub>                   | 2.25E-03                         | 0.25                                     | 0.02                                    | 21                       |

**Notes:**

a) Thermal Oxidizer Pilots are rated at 0.15 MMBtu/hr and fired with purchased natural gas. Enriching gas was estimated at 0.1 MMBtu/hr

b) Based on total amount of uncombusted loading losses.

c) Heating Values the Lower Heating Values taken from Hydrogen Analysis Resource Center: Lower and Higher Heating Values of Hydrogen and Fuels

d) PM<sub>10</sub> and PM<sub>2.5</sub> are 100% of Total PM emissions, from CEIDARS PM2.5 Emission Factor Table

**References:**

Emission Factors for NO<sub>x</sub>, CO and VOC obtained from EPA AP-42, Chapter 13.5 *Flares*, and for PM from EPA AP-42, Chapter 1.4, *Natural Gas Combustion*.

SO<sub>2</sub> emission factors are based on the expected sulfur content of the products combusted in the thermal oxidizer @ 0.5% S per lb crude oil.

SO<sub>2</sub> emissions from natural gas are negligible.

**Truck Loading - Thermal Oxidizer**  
PTE Estimated Emissions  
ERGON - West Virginia, Inc., Newell Refinery

**Loading Area Emissions - OXIDIZER**

SCENARIO 2

| Hexane |             |              | Toluene |             |              | Ethylbenzene |             |              | Xylene |             |              |
|--------|-------------|--------------|---------|-------------|--------------|--------------|-------------|--------------|--------|-------------|--------------|
| Wt %   | lb/hr       | tpy          | Wt %    | lb/hr       | tpy          | Wt %         | lb/hr       | tpy          | Wt %   | lb/hr       | tpy          |
| 1.00%  | 0.11        | 0.140        | 7.00%   | 0.75        | 0.977        | 1.40%        | 0.15        | 0.195        | 7.00%  | 0.75        | 0.977        |
|        | <b>0.11</b> | <b>0.140</b> |         | <b>0.75</b> | <b>0.977</b> |              | <b>0.15</b> | <b>0.195</b> |        | <b>0.75</b> | <b>0.977</b> |

**Marine Barge Loading**  
PTE Estimated Emissions  
ERGON - West Virginia, Inc., Newell Refinery

**Loading Area Emissions**

| Location                             | Product                 | Quantity       | Max Loading | Loading Losses <sup>2</sup> | VOC Emissions |              | Benzene | Benzene Emissions |              |
|--------------------------------------|-------------------------|----------------|-------------|-----------------------------|---------------|--------------|---------|-------------------|--------------|
|                                      |                         | Mgal/yr        | Mgal/min    | lb/Mgal                     | lb/hr         | tpy          | Wt %    | lb/hr             | tpy          |
| MLD                                  | Gasoline <sup>1,3</sup> | 62,031         | 1.40        | 3.90E+00                    | 4.26          | 1.572        | 1.80%   | 0.08              | 0.028        |
|                                      | ALS Crude <sup>1</sup>  | 306,600        | 3.50        | 1.53E+00                    | 4.17          | 3.046        | 0.08%   | 0.00              | 0.002        |
|                                      | Diesel                  | 37,065         | 1.40        | 1.56E-02                    | 1.31          | 0.289        | 0.00%   | 0.00              | 0.000        |
|                                      | Kerosene                | 46,000         | 1.40        | 1.23E-02                    | 1.03          | 0.283        | 0.00%   | 0.00              | 0.000        |
|                                      | Lube Oil                | 30,660         | 1.40        | 2.23E-03                    | 0.19          | 0.034        | 0.17%   | 0.00              | 0.000        |
| <b>Total Barge Loading Emissions</b> |                         | <b>482,356</b> |             |                             | <b>10.964</b> | <b>5.225</b> |         | <b>0.080</b>      | <b>0.031</b> |

<sup>1</sup>The throughput were changed for these compounds.

<sup>2</sup>The gasoline and the ALS Crude loadings are controlled by a thermal oxidizer.

<sup>3</sup>Barge loading emissions for gasoline are given as 3.9 lb/Mgal transferred to an unclean barge.

\*Naphtha loading emissions are calculated in the gasoline calculations.

\*MLD emissions are the Diesel, Kerosene, and Lube Oil loading losses plus 5% of ALS, Naphtha, and Gasoline when C=1

| Eqn. L=12.46(SPM/T)*C |           |          |             |          |          |          | Eqn. C <sub>L</sub> =(C <sub>A</sub> +C <sub>G</sub> )*C |                |         |
|-----------------------|-----------|----------|-------------|----------|----------|----------|----------------------------------------------------------|----------------|---------|
| Diesel                |           | Kerosene |             | Lube Oil |          | Gasoline |                                                          | ALS Crude      |         |
| S                     | 0.6       | S        | 0.5         | S        | 0.5      | S        | 0.5                                                      | C <sub>A</sub> | 0.731   |
| P                     | 0.009     | P        | 0.0085      | P        | 0.001    | P        | 6.6                                                      | C <sub>G</sub> | 0.79764 |
| M                     | 130       | M        | 130         | M        | 200      | M        | 66                                                       | P              | 11      |
| T                     | 560       | T        | 560         | T        | 560      | T        | 560                                                      | M              | 50      |
| C                     | 1         | C        | 1           | C        | 1        | C        | 1                                                        | G              | 1.02    |
| L                     | 0.0156195 | L        | 0.012293125 | L        | 0.002225 | L        | 4.84605                                                  | T              | 520     |
|                       |           |          |             |          |          |          |                                                          | C              | 1       |
|                       |           |          |             |          |          |          |                                                          | C <sub>L</sub> | 1.52864 |

S= saturation factor (ch. 5.2)

P= True Vapor Pressure of liquid loaded (psia) (ch 7.1)

M= molecular weight of vapors (lb/lb-mole) (ch 7.1)

T= temperature of bulk liquid loaded ( R)(average ambient temperature for Pittsburg, PA)

C= control efficiency

C<sub>A</sub>= arrival emission factor (table 5.2-3)

C<sub>G</sub>= generated emission factor

G= vapor growth factor (given as 1.02 dimensionless)

**Marine Barge Loading**  
PTE Estimated Emissions  
ERGON - West Virginia, Inc., Newell Refinery

**Loading Area Emissions - MLD**

| <b>Hexane</b> | <b>Hexane Emissions</b> | <b>Toluene</b> | <b>Toluene Emissions</b> | <b>Ethylbenzene</b> | <b>Ethylbenzene Emissions</b> | <b>Xylene</b> | <b>Xylene Emissions</b> |
|---------------|-------------------------|----------------|--------------------------|---------------------|-------------------------------|---------------|-------------------------|
| <b>Wt %</b>   | <b>tpy</b>              | <b>Wt %</b>    | <b>tpy</b>               | <b>Wt %</b>         | <b>tpy</b>                    | <b>Wt %</b>   | <b>tpy</b>              |
| 1.00%         | 0.016                   | 7.00%          | 0.110                    | 1.40%               | 0.022                         | 7.00%         | 0.110                   |
| 6.11%         | 0.186                   | 0.52%          | 0.016                    | 0.06%               | 0.002                         | 0.75%         | 0.023                   |
| 0.01%         | 0.000                   | 0.13%          | 0.000                    | 0.13%               | 0.000                         | 0.31%         | 0.001                   |
| 0.01%         | 0.000                   | 0.13%          | 0.000                    | 0.13%               | 0.000                         | 0.31%         | 0.001                   |
| 0.40%         | 0.000                   | 1.00%          | 0.000                    | 0.40%               | 0.000                         | 1.40%         | 0.000                   |
|               | <b>0.202</b>            |                | <b>0.127</b>             |                     | <b>0.025</b>                  |               | <b>0.135</b>            |

**Marine Barge Loading - Thermal Oxidizer**  
PTE Estimated Emissions  
ERGON - West Virginia, Inc., Newell Refinery

**Loading Area Emissions**

| Location                       | Product                  | Quantity       | Max Loading | Loading Losses <sup>2</sup> | VOC Emissions |             | Benzene | Benzene Emissions |              | Hexane |
|--------------------------------|--------------------------|----------------|-------------|-----------------------------|---------------|-------------|---------|-------------------|--------------|--------|
|                                |                          | Mgal/yr        | Mgal/min    | lb/Mgal                     | lb/hr         | tpy         | Wt %    | lb/hr             | tpy          | Wt %   |
| MLDOX                          | Gasoline <sup>1,3</sup>  | 62,031         | 1.40        | 7.80E-02                    | 6.47          | 2.388       | 1.80%   | 0.12              | 0.043        | 1.00%  |
|                                | Light Crude <sup>1</sup> | 306,600        | 3.50        | 3.06E-02                    | 6.34          | 4.626       | 0.08%   | 0.01              | 0.004        | 6.11%  |
| <b>MLDOX Loading Emissions</b> |                          | <b>346,987</b> |             |                             | <b>12.80</b>  | <b>7.01</b> |         | <b>0.122</b>      | <b>0.047</b> |        |

<sup>1</sup>The throughput were changed for these compounds.

<sup>2</sup>The gasoline and the ALS Crude loadings are controlled by a thermal oxidizer.

<sup>3</sup>Barge loading emissions for gasoline are given as 3.9 lb/Mgal transferred to an unclean barge, with a 98% control efficiency.

\*Naphtha loading emissions are calculated in the gasoline calculations.

\*MLD emissions are the Diesel, Kerosene, and Lube Oil loading losses plus 5% of ALS, Naphtha, and Gasoline when C=1

| Eqn. $L=12.46(SPM/T)*C$ |           |          |             |          | Eqn. $C_L=(C_A+C_G)*C$ |                  |          |                      |           |
|-------------------------|-----------|----------|-------------|----------|------------------------|------------------|----------|----------------------|-----------|
| Diesel                  |           | Kerosene |             | Lube Oil |                        | Gasoline         |          | ALS Crude            |           |
| S                       | 0.6       | S        | 0.5         | S        | 0.5                    | S                | 0.5      | $C_A$                | 0.731     |
| P                       | 0.009     | P        | 0.0085      | P        | 0.001                  | P                | 6.6      | $C_G$                | 0.79764   |
| M                       | 130       | M        | 130         | M        | 200                    | M                | 66       | P                    | 11        |
| T                       | 560       | T        | 560         | T        | 560                    | T                | 560      | M                    | 50        |
| C                       | 1         | C        | 1           | C        | 1                      | C                | 0.02     | G                    | 1.02      |
| L                       | 0.0156195 | L        | 0.012293125 | L        | 0.002225               | L (uncontrolled) | 4.84605  | T                    | 520       |
|                         |           |          |             |          |                        | L (controlled)   | 0.096921 | C                    | 0.02      |
|                         |           |          |             |          |                        |                  |          | $C_L$ (uncontrolled) | 1.52864   |
|                         |           |          |             |          |                        |                  |          | $C_L$ (controlled)   | 0.0305728 |

S= saturation factor (ch. 5.2)

P= True Vapor Pressure of liquid loaded (psia) (ch 7.1)

M= molecular weight of vapors (lb/lb-mole) (ch 7.1)

T= temperature of bulk liquid loaded ( R)(average ambient temperature for Pittsburg, PA)

C= control efficiency

$C_A$ = arrival emission factor (table 5.2-3)

$C_G$ = generated emission factor

G= vapor growth factor (given as 1.02 dimensionless)

**Marine Barge Loading - Thermal Oxidizer**  
PTE Estimated Emissions  
ERGON - West Virginia, Inc., Newell Refinery

**Loading Area Emissions - MLDOX**

| Hexane Emissions | Toluene | Toluene Emissions | Ethylbenzene | Ethylbenzene Emissions | Xylene | Xylene Emissions |
|------------------|---------|-------------------|--------------|------------------------|--------|------------------|
| tpy              | Wt %    | tpy               | Wt %         | tpy                    | Wt %   | tpy              |
| 0.024            | 7.00%   | 0.167             | 1.40%        | 0.033                  | 7.00%  | 0.167            |
| 0.283            | 0.52%   | 0.024             | 0.06%        | 0.003                  | 0.75%  | 0.035            |
| <b>0.307</b>     |         | <b>0.191</b>      |              | <b>0.036</b>           |        | <b>0.202</b>     |

| Marine Thermal Oxidizer Product Inputs (lbs) | Total Product Combusted (lbs/yr) | Heat Value of Product (Btu/lb) <sup>(c)</sup> | Heat Ratings (MMBtu/hr) | Total Energy Combusted (MMBtu/yr) |
|----------------------------------------------|----------------------------------|-----------------------------------------------|-------------------------|-----------------------------------|
| <b>Thermal Oxidizer</b>                      |                                  |                                               |                         |                                   |
| Natural Gas (enriching gas) <sup>(a)</sup>   | 43,223                           | 20,267                                        | 0.10                    | 876                               |
| Natural Gas (pilot gas) <sup>(a)</sup>       | 64,834                           | 20,267                                        | 0.15                    | 1,314                             |
| Product Loading Losses <sup>(b)</sup>        | 655,761                          | 18,352                                        | -                       | 12,035                            |
| total:                                       | 763,818                          |                                               |                         | 14,225                            |

| Pollutants                       | Emission Factors (lb/MMBtu)      | Thermal Oxidizer Est. Emissions (ton/yr) |
|----------------------------------|----------------------------------|------------------------------------------|
| <b>Thermal Oxidizer</b>          |                                  |                                          |
| NO <sub>x</sub>                  | 0.068                            | 0.48                                     |
| CO                               | 0.370                            | 2.63                                     |
| SO <sub>2</sub>                  | 0.005 lb SO <sub>2</sub> /lb HCV | 1.64                                     |
| PM                               | 0.007                            | 0.05                                     |
| PM <sub>2.5</sub> <sup>(d)</sup> | 100% of PM <sub>10</sub>         | 0.05                                     |
| CO <sub>2e</sub>                 | 117.647                          | 836.74                                   |



**Marine Barge Loading - Thermal Oxidizer**  
PTE Estimated Emissions  
ERGON - West Virginia, Inc., Newell Refinery

**Notes:**

- a) Thermal Oxidizer Pilots are rated at 0.15 MMBtu/hr and fired with purchased natural gas. Enriching gas was estimated at 0.1 MMBtu/hr
- b) Product Loading Losses is the combination of quantity (Mgal/yr)\* Loading Losses (lb/Mgal)\* Capture Efficiency (95%) for gasoline and light crude loaded, taken from above.
- c) Heating Values the Lower Heating Values taken from Hydrogen Analysis Resource Center: Lower and Higher Heating Values of Hydrogen and Fuels
- d) PM<sub>2.5</sub> is 100% of PM<sub>10</sub> emissions, from CEIDARS PM2.5 Emission Factor Table

**References:**

Emission Factors for NO<sub>x</sub>, CO and VOC obtained from EPA AP-42, Chapter 13.5 *Flares*, and for PM from EPA AP-42, Chapter 1.4, *Natural Gas Combustion*. SO<sub>2</sub> emission factors are based on the expected sulfur content of the products combusted in the thermal oxidizer @ 0.5% S per lb crude oil. VOC emissions from the thermal oxidizer are calculated in the Truck-Rail Loading Spreadsheet. SO<sub>2</sub> emissions from natural gas are negligible.

**Example Calculation:**

Calculated emissions (ton/yr) = [emission factor (lb/MMBtu)] x [total energy usage (MMBtu/yr)] x [ton/ 2000 lb]

Example NO<sub>x</sub> calculation = 0.068 (lb/MMBtu) x 15,087 (MMBtu/yr) x (1 ton/2000 lb) = 0.51 ton/yr

**Fixed-Roof Tank Emissions - Monthly**

Based on AP-42, November 2006, Section 7.1.3.1.

Tool Last Updated: 12/14/15 [Click Here to Go Back to Cover Page](#)

|                       |      |
|-----------------------|------|
| <b>Reporting Year</b> | 2018 |
|-----------------------|------|

| Tank Reference Parameters         |                                                                                                                    |                     |                                  |                          |
|-----------------------------------|--------------------------------------------------------------------------------------------------------------------|---------------------|----------------------------------|--------------------------|
| Parameter Title                   | Notes                                                                                                              | Parameter Symbol    | Units                            | Value                    |
| Tank ID                           | Enter only Tank ID in this tab.                                                                                    |                     |                                  | TBD                      |
| Tank Name                         | Text Description of Tank Name                                                                                      | TK <sub>name</sub>  |                                  | New Crude Feed Tank      |
| Actual Location                   |                                                                                                                    | LOC <sub>act</sub>  |                                  | Newell                   |
| Location for Calculation Purposes |                                                                                                                    | LOC <sub>calc</sub> |                                  | Pittsburgh, Pennsylvania |
| Tank/Roof Type                    |                                                                                                                    | TK <sub>roof</sub>  |                                  | VFR - Cone               |
| Normal Capacity                   |                                                                                                                    | Cap                 | gal                              | 1,260,000                |
| Diameter                          |                                                                                                                    | D                   | ft                               | 70                       |
| Shell Height or Length            |                                                                                                                    | H <sub>S</sub>      | ft                               | 48                       |
| Effective Diameter                | = ((H <sub>S</sub> * D) / (π/4)) <sup>0.5</sup> (horiz. tanks only, Eqn. 1-13)<br>= D (all other fixed roof tanks) | D <sub>E</sub>      | ft                               | 70.0                     |
| Effective Height                  | = π/4 * D (horiz. tanks only, Eqn. 1-14)<br>= H <sub>S</sub> (all other fixed roof tanks)                          | H <sub>E</sub>      | ft                               | 48.0                     |
| External Shell Color              |                                                                                                                    | SC <sub>ext</sub>   |                                  | White                    |
| External Shell Paint Condition    |                                                                                                                    | PC <sub>shell</sub> |                                  | Good                     |
| Roof Color/Shade                  |                                                                                                                    | RC                  |                                  | White                    |
| Roof Paint Condition              |                                                                                                                    | PC <sub>roof</sub>  |                                  | Good                     |
| Tank Shell Solar Absorbance       |                                                                                                                    | α <sub>shell</sub>  |                                  | 0.17                     |
| Tank Roof Paint Solar Absorbance  |                                                                                                                    | α <sub>roof</sub>   |                                  | 0.17                     |
| Total Tank Paint Solar Absorbance | = (α <sub>shell</sub> + α <sub>roof</sub> ) / 2 (Note A, Table 7.1-6)                                              | α <sub>tot</sub>    |                                  | 0.17                     |
| Ideal Gas Constant,               |                                                                                                                    | R                   | psia ft <sup>3</sup> / lbmole °R | 10.731                   |
| Ambient Pressure                  |                                                                                                                    | P <sub>A</sub>      | psia                             | 14.109                   |

| Tank Reference Parameters            |                                                                                                                                                                    |                   |                 |             |
|--------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|-----------------|-------------|
| Parameter Title                      | Notes                                                                                                                                                              | Parameter Symbol  | Units           | Value       |
| Underground Tank?                    |                                                                                                                                                                    | UT                |                 | Aboveground |
| Heated Tank?                         |                                                                                                                                                                    | HT                |                 | Yes         |
| Liquid Bulk Temperature              | Heated Tanks Only                                                                                                                                                  | T <sub>B</sub>    | Degrees F       | 170.0       |
| Insulated Tank?                      |                                                                                                                                                                    | IT                |                 | Fully       |
| Pressure Tank?                       |                                                                                                                                                                    | PT                |                 | Atmospheric |
| Normal Operating Pressure            | Only for Pressure Tanks                                                                                                                                            | P <sub>I</sub>    | psig            | 0.0         |
| Vapor Tight Roof                     |                                                                                                                                                                    | VTR               |                 | No          |
| Control Device                       | = None (No vapor tight roof)<br>= User Specified                                                                                                                   | CD                |                 | None        |
| Control Device Efficiency            |                                                                                                                                                                    | CD <sub>eff</sub> | %               | --          |
| Maximum Liquid Height                |                                                                                                                                                                    | H <sub>LX</sub>   | ft              | 45.0        |
| Dome Tank Roof Height                | = R <sub>R</sub> - (R <sub>R</sub> <sup>2</sup> - (D / 2) <sup>2</sup> ) <sup>0.5</sup> (dome roof with D = 2 * R <sub>S</sub> , Eqn. 1-19)                        | H <sub>R</sub>    | ft              | --          |
| Roof Outage                          | = S <sub>R</sub> * (D / 2) / 3 (cone roof, Eqn. 1-16 and 1-17)<br>= H <sub>R</sub> * (1/2 + 1/6 * (H <sub>R</sub> / (D / 2)) <sup>2</sup> ) (dome roof, Eqn. 1-18) | H <sub>RO</sub>   | ft              | 0.7         |
| Breather Vent Pressure Setting       | = 0 (No vapor tight roof, AP-42 Pg. 7.1-13 Note 3)<br>= User Specified                                                                                             | P <sub>BP</sub>   | psig            | 0.00        |
| Breather Vent Vacuum Setting         | = Default +/-0.03 psig if unknown                                                                                                                                  | P <sub>BV</sub>   | psig            | 0.00        |
| Breather Vent Pressure Setting Range | = 0 (No vapor tight roof)<br>= P <sub>BP</sub> - P <sub>BV</sub> (Eqn. 1-11)                                                                                       | ΔP <sub>B</sub>   | psig            | 0.00        |
| Dome Roof Radius                     | Dome Roofs Only<br>= user input between 0.8 to 1.2 * D (AP-42 7.1-15)<br>= 1.0 * D (default if blank)                                                              | R <sub>R</sub>    | ft              | --          |
| Cone Roof Slope                      | Cone Roofs Only<br>Default = 0.0625 ft/ft                                                                                                                          | S <sub>R</sub>    | ft/ft           | 0.0625      |
| Tank Maximum Liquid Volume           | = π/4 * D <sub>E</sub> <sup>2</sup> * H <sub>LX</sub> (Eqn. 1-31)<br>Though not stated in AP-42, use DE in place of D for hor. tanks.                              | V <sub>LX</sub>   | ft <sup>3</sup> | 173,180     |
| Days per Year                        | For leap years, days = 366                                                                                                                                         | t <sub>yr</sub>   | days/yr         | 365         |

| Emission Summary       |                |                                                                                                                                                                                     |      |
|------------------------|----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Annual Throughput, gal | 23,000,004     | Annual Emissions                                                                                                                                                                    | 1.43 |
| Annual Turnovers       | 17.75          | Note: The emission summary table is pulled into the Tank Emissions tab using cell references A31:B42. The emission summary must remain at this cell reference to function properly. |      |
| Month                  | Emissions, lbs | Emissions, tons                                                                                                                                                                     |      |
| Jan                    | 239.03         | 0.120                                                                                                                                                                               |      |
| Feb                    | 239.03         | 0.120                                                                                                                                                                               |      |
| Mar                    | 239.03         | 0.120                                                                                                                                                                               |      |
| Apr                    | 239.03         | 0.120                                                                                                                                                                               |      |
| May                    | 239.03         | 0.120                                                                                                                                                                               |      |
| Jun                    | 239.03         | 0.120                                                                                                                                                                               |      |
| Jul                    | 239.03         | 0.120                                                                                                                                                                               |      |
| Aug                    | 239.03         | 0.120                                                                                                                                                                               |      |
| Sep                    | 239.03         | 0.120                                                                                                                                                                               |      |
| Oct                    | 239.03         | 0.120                                                                                                                                                                               |      |
| Nov                    | 239.03         | 0.120                                                                                                                                                                               |      |
| Dec                    | 239.03         | 0.120                                                                                                                                                                               |      |



| Calculations                              |                                                                                                                                                                                                                                        | 10                   | 11                   | 12                   |
|-------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------|----------------------|
| Parameter Title                           | Notes                                                                                                                                                                                                                                  | Oct                  | Nov                  | Dec                  |
| <b>Service</b>                            |                                                                                                                                                                                                                                        | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  |
| Type of Substance                         | Select Organic Liquid, Petroleum Distillate, or Crude Oil                                                                                                                                                                              | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate |
| Contents of Tank                          | Select from list (add new compounds in 'VOLs' tab):                                                                                                                                                                                    | Residual oil no. 6   | Residual oil no. 6   | Residual oil no. 6   |
| Speciation Profile                        | Select from list (add new in 'Speciation Input' tab):                                                                                                                                                                                  | --                   | --                   | --                   |
| Speciation Profile Type                   |                                                                                                                                                                                                                                        | None                 | None                 | None                 |
| Monthly Throughput                        |                                                                                                                                                                                                                                        | 1,916,667            | 1,916,667            | 1,916,667            |
| Days-In-Service                           | Total days per month minus the days tank has a service change, is out of service, or for non-routine events.                                                                                                                           | 31                   | 30                   | 31                   |
| Constant in the vapor pressure equation   | Used in $\Delta P_v$ only for petroleum liquids. If full speciation profile specified, leave blank.                                                                                                                                    | 8,933                | 8,933                | 8,933                |
| Average Liquid Height                     | Leave blank if unknown. Not applicable for horizontal Tanks. Fill out for tanks operating on level control.                                                                                                                            | 22.5                 | 22.5                 | 22.5                 |
| Vapor Space Outage                        |                                                                                                                                                                                                                                        | 26.2                 | 26.2                 | 26.2                 |
| Daily Total Solar Insolation Factor       |                                                                                                                                                                                                                                        | 959                  | 581                  | 446                  |
| Vent Setting Correction Factor            |                                                                                                                                                                                                                                        | 1.000                | 1.000                | 1.000                |
| Vapor Space Expansion Factor              | Per AP-42 7.1-12, use Eqn. 1-6 if PVA, $T_b < 0.1$ psia. Tank location is always known for this tool. True vapor pressure based on liquid stock. If $KE < 0$ , no standing losses occur. Per API MPMS Ch. 19.1.2.1.4.2, $K_E \geq 0$ . | 0.0000               | 0.0000               | 0.0000               |
| Working Loss Turnover (Saturation) Factor | Per Eqn. 1-29, annual threshold for turnovers is 36. Equation modified to a monthly form by converting the monthly turnovers to a theoretical annual turnover equivalent.                                                              | 1.00                 | 1.00                 | 1.00                 |
| Working Loss Product Factor               |                                                                                                                                                                                                                                        | 1.00                 | 1.00                 | 1.00                 |
| Vented Vapor Saturation Factor            | Constant 0.053 has units of $1/(\text{psia}\cdot\text{ft})$ . True vapor pressure based on liquid surface.                                                                                                                             | 0.956                | 0.956                | 0.956                |
| Vapor Molecular Weight                    | When using full speciation profiles, calculated as the weighted average of the $M_v$ of each component.                                                                                                                                | 190.0                | 190.0                | 190.0                |
| Liquid Molecular Weight                   |                                                                                                                                                                                                                                        | 387.0                | 387.0                | 387.0                |
| Number of Turnovers per Month             | Constant 5.614 has units of $\text{ft}^3/\text{bbl}$ .                                                                                                                                                                                 | 1.48                 | 1.48                 | 1.48                 |
| Average Daily Minimum Ambient Temperature |                                                                                                                                                                                                                                        | 42.30                | 34.10                | 24.40                |
| Average Daily Maximum Ambient Temperature |                                                                                                                                                                                                                                        | 62.50                | 50.40                | 38.60                |
| Daily Average Ambient Temperature         |                                                                                                                                                                                                                                        | 52.40                | 42.25                | 31.50                |
| Daily Minimum Liquid Surf. Temperature, F |                                                                                                                                                                                                                                        | 170.00               | 170.00               | 170.00               |
| Daily Maximum Liquid Surf. Temperature, F |                                                                                                                                                                                                                                        | 170.00               | 170.00               | 170.00               |
| Daily Vapor Temperature Range             | Constant 0.028 has units of ( $^{\circ}\text{R}\cdot\text{ft}^2\cdot\text{day}/\text{Btu}$ )                                                                                                                                           | 0.00                 | 0.00                 | 0.00                 |



| Calculations                                    |                                                                                                                                                                      | 11            | 12            | 13            |
|-------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|---------------|---------------|
| Parameter Title                                 | Notes                                                                                                                                                                | Oct           | Nov           | Dec           |
| Service                                         |                                                                                                                                                                      | Main Service  | Main Service  | Main Service  |
| Daily Average Liquid Surf. Temperature          | Constant 0.0079 has units of ( $^{\circ}\text{R-ft}^2\text{-day/btu}$ ).                                                                                             | 170.00        | 170.00        | 170.00        |
| Liquid Bulk Temperature                         | If $T_{LA}$ is unknown, see AP-42 7.1-23 Note 3. Not included here as $T_B$ is always calculated. $\alpha_{TOT}$ is not applicable for fully insulated tanks.        | 170.00        | 170.00        | 170.00        |
| Vapor Pressure at Daily Av. Liquid Surf. Temp.  | Used for speciated emissions and most vapor pressures. $P_{VA, T_{La}}$ uses $T_{LA}$ .                                                                              | 0.0332        | 0.0332        | 0.0332        |
| Vapor Pressure at Daily Min. Liquid Surf. Temp. | Used for $\Delta P_V$ . Per AP-42 7.1-13 Note 5, $P_{VN}$ uses $T_{LN}$ .                                                                                            | 0.0332        | 0.0332        | 0.0332        |
| Vapor Pressure at Daily Max. Liquid Surf. Temp. | Used for $\Delta P_V$ . Per AP-42 7.1-13 Note 5, $P_{VX}$ uses $T_{LX}$ .                                                                                            | 0.0332        | 0.0332        | 0.0332        |
| Daily Vapor Pressure Range                      | Eqn. 1-10 is alt. method per AP-42 7.1-13. Used as primary method for Petroleum Distillates & Crude. True vapor pressure based on liquid surface.                    | 0.000         | 0.000         | 0.000         |
| Vapor Density                                   |                                                                                                                                                                      | 0.00093       | 0.00093       | 0.00093       |
| Vapor Space Volume                              |                                                                                                                                                                      | 100,942       | 100,942       | 100,942       |
| Standing Storage Loss                           | Uncontrolled emissions. No standing or breathing losses occur for underground tanks per AP-42 7.1-14.                                                                | 0.00          | 0.00          | 0.00          |
| Working Loss                                    | Uncontrolled emissions. True vapor pressure based on liquid surface. Constant 0.0010 derived from Eqn. 1-32, 1-33, and 1-35 assuming $T_{LA} = 63^{\circ}\text{F}$ . | 239.03        | 239.03        | 239.03        |
| <b>Total Losses</b>                             | <b>Uncontrolled emissions.</b>                                                                                                                                       | <b>239.03</b> | <b>239.03</b> | <b>239.03</b> |
| <b>Total Losses</b>                             | <b>Controlled emissions, if applicable. Note: some species have 0% efficiencies with activated carbon.</b>                                                           | <b>239.03</b> | <b>239.03</b> | <b>239.03</b> |

**Floating Roof Tank Emissions**

Based on AP-42, November 2006, Section 7.1.3.2.

Tool Last Updated: 12/14/15 [Click Here to Go Back to Cover Page](#)

|                       |      |
|-----------------------|------|
| <b>Reporting Year</b> | 2017 |
|-----------------------|------|

| Tank Reference Parameters         |                                                                       |                        |                                  |                             |
|-----------------------------------|-----------------------------------------------------------------------|------------------------|----------------------------------|-----------------------------|
| Parameter Title                   | Notes                                                                 | Parameter Symbol       | Units                            | Value                       |
| Tank ID                           | Enter only Tank ID in this tab.                                       |                        |                                  | 4071S2                      |
| Tank Name                         |                                                                       | TK <sub>name</sub>     |                                  | Gasoline EFR Scenario 2 New |
| Actual Location                   |                                                                       | Loc <sub>Act</sub>     |                                  | Newell, West Virginia       |
| Location for Calculation Purposes |                                                                       | Loc <sub>Calc</sub>    |                                  | Pittsburgh, Pennsylvania    |
| Tank Roof Type                    |                                                                       | TK <sub>roof</sub>     |                                  | EFR - Pontoon               |
| Normal Capacity                   |                                                                       | Cap                    | gal                              | 1,260,000                   |
| Diameter                          |                                                                       | D                      | ft                               | 67.0                        |
| Shell Height or Length            |                                                                       | H <sub>S</sub>         | ft                               | 48.0                        |
| External Shell Color              |                                                                       | SC <sub>ext</sub>      |                                  | White                       |
| External Shell Paint Condition    |                                                                       | PC <sub>Shell</sub>    |                                  | Good                        |
| Roof Color/Shade                  |                                                                       | RC                     |                                  | White                       |
| Roof Paint Condition              |                                                                       | PC <sub>Roof</sub>     |                                  | Good                        |
| Tank Shell Solar Absorbance       |                                                                       | α <sub>Shell</sub>     |                                  | 0.17                        |
| Tank Roof Paint Solar Absorbance  |                                                                       | α <sub>Roof</sub>      |                                  | 0.17                        |
| Total Tank Paint Solar Absorbance | = (α <sub>Shell</sub> + α <sub>Roof</sub> ) / 2 {Note A, Table 7.1-6} | α <sub>Tot</sub>       |                                  | 0.17                        |
| Ideal Gas Constant,               |                                                                       | R                      | psia ft <sup>3</sup> / lbmole °R | 10.731                      |
| Ambient Pressure                  |                                                                       | P <sub>A</sub>         | psia                             | 14.109                      |
| Rim-Seal System                   |                                                                       | TK <sub>RimSeal</sub>  |                                  | Mechanical-shoe/Rim-mounted |
| Tank Fittings                     |                                                                       | TK <sub>Fittings</sub> |                                  | Detail                      |

| Floating Roof Parameters                    |                                                                                                                                                                                                                                                                                                                                        |                         |                                     |            |
|---------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-------------------------------------|------------|
| Parameter Title                             | Notes                                                                                                                                                                                                                                                                                                                                  | Parameter Symbol        | Units                               | Value      |
| Heated Tank?                                |                                                                                                                                                                                                                                                                                                                                        | HT                      |                                     | No         |
| Liquid Bulk Temperature                     | Heated Tanks Only                                                                                                                                                                                                                                                                                                                      | T <sub>B</sub>          | Degrees F                           | --         |
| Number of fixed roof support columns        |                                                                                                                                                                                                                                                                                                                                        | N <sub>Col</sub>        |                                     | 0          |
| Effective Column Diameter                   | 1.1 for 9" by 7" built-up column<br>0.7 for 8" diameter pipe column<br>1.0 for unknown pipe column                                                                                                                                                                                                                                     | F <sub>C</sub>          | (col perimeter/π) ft                | 1.0        |
| Internal Shell Condition                    |                                                                                                                                                                                                                                                                                                                                        | SC <sub>int</sub>       |                                     | Light Rust |
| Tank Construction                           |                                                                                                                                                                                                                                                                                                                                        | TK <sub>Const</sub>     |                                     | Welded     |
| Deck Type                                   |                                                                                                                                                                                                                                                                                                                                        | TK <sub>Deck</sub>      |                                     | --         |
| Total Length of Deck Seams                  |                                                                                                                                                                                                                                                                                                                                        | L <sub>Seam</sub>       | ft                                  | --         |
| Area of deck                                | = π * D <sup>2</sup> / 4 {Eqn. 2-9}                                                                                                                                                                                                                                                                                                    | A <sub>deck</sub>       | ft <sup>2</sup>                     | 3,525.7    |
| Deck Seam Length Factor                     | = L <sub>Seam</sub> / A <sub>deck</sub> {Eqn. 2-9}<br>= 0.20 ft/ft <sup>2</sup> (5' wide sheet)<br>= 0.17 ft/ft <sup>2</sup> (6' wide sheet)<br>= 0.14 ft/ft <sup>2</sup> (7' wide sheet)<br>= 0.33 ft/ft <sup>2</sup> (5' x 7.5' panels)<br>= 0.28 ft/ft <sup>2</sup> (5' 12' panels)<br>= 0.20 ft/ft <sup>2</sup> (most common type) | S <sub>D</sub>          | ft/ft <sup>2</sup>                  | --         |
| Deck Construction (IFR w/Bolted Decks Only) | Not applicable if L <sub>Seam</sub> specified.                                                                                                                                                                                                                                                                                         | TK <sub>DeckConst</sub> |                                     | --         |
| Zero wind speed rim seal loss factor        | AP-42 Table 7.1-8                                                                                                                                                                                                                                                                                                                      | K <sub>RA</sub>         | lb-mole/ft-yr                       | 0.6        |
| Wind speed dependent rim seal loss factor   | AP-42 Table 7.1-8                                                                                                                                                                                                                                                                                                                      | K <sub>RB</sub>         | lb-mole/(mph) <sup>1.5</sup> -ft-yr | 0.4        |
| Fitting Wind Speed Correction Factor        | = 0.7 {EFR Tanks Only}<br>= 0.0 {IFR and Domed EFR Tanks Only} {Eqn. 2-7}                                                                                                                                                                                                                                                              | K <sub>V</sub>          |                                     | 0.7        |
| Seal related wind speed exponent            |                                                                                                                                                                                                                                                                                                                                        | n                       |                                     | 1.0        |
| Days per Year                               | For leap years, days = 366                                                                                                                                                                                                                                                                                                             | t <sub>yr</sub>         | days/yr                             | 365        |

| Emission Summary       |                            |                  |       |
|------------------------|----------------------------|------------------|-------|
| Annual Throughput, gal | 32,850,000                 | Annual Turnovers | 26.07 |
| Annual Emissions, tons | 2.12                       |                  |       |
| Month                  | Normal Operation Loss, lbs | Emissions, tpy   |       |
| Jan                    | 218.03                     | 0.109            |       |
| Feb                    | 208.11                     | 0.104            |       |
| Mar                    | 299.71                     | 0.150            |       |
| Apr                    | 362.70                     | 0.181            |       |
| May                    | 426.34                     | 0.213            |       |
| Jun                    | 473.66                     | 0.237            |       |
| Jul                    | 512.72                     | 0.256            |       |
| Aug                    | 465.41                     | 0.233            |       |
| Sep                    | 401.19                     | 0.201            |       |
| Oct                    | 340.47                     | 0.170            |       |
| Nov                    | 291.19                     | 0.146            |       |
| Dec                    | 242.09                     | 0.1210           |       |

Note: The emission summary table is pulled into the Tank Emissions tab using cell references A31:B42. The emission summary must remain at this cell reference to function properly.

| Calculations                                   |                                                                                                                  |                      |                            |                                                                                                                                                                                                                                                                                                                                                                                                                | 1                    | 2                    | 3                    | 4                    | 5                    | 6                    | 7                    | 8                    |
|------------------------------------------------|------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Parameter Title                                | Notes                                                                                                            | Parameter Symbol     | Units                      | Reference or Equation                                                                                                                                                                                                                                                                                                                                                                                          | Jan                  | Feb                  | Mar                  | Apr                  | May                  | Jun                  | Jul                  | Aug                  |
| <b>Service</b>                                 |                                                                                                                  |                      |                            |                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  |
| Type of Substance                              | Select Organic Liquid, Petroleum Distillate, or Crude Oil                                                        |                      |                            |                                                                                                                                                                                                                                                                                                                                                                                                                | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate |
| Contents of Tank                               | Select from list (add new compounds in 'VOLs' tab):                                                              |                      |                            | = User specified                                                                                                                                                                                                                                                                                                                                                                                               | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    |
| Speciation Profile                             | Select from list (add new in 'Speciation Input' tab):                                                            |                      |                            | = User specified                                                                                                                                                                                                                                                                                                                                                                                               | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    |
| Speciation Profile Type                        |                                                                                                                  |                      |                            | = User specified                                                                                                                                                                                                                                                                                                                                                                                               | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   |
| Monthly Throughput                             |                                                                                                                  | Q                    | gal/month                  | = User specified                                                                                                                                                                                                                                                                                                                                                                                               | 2,737,500            | 2,737,500            | 2,737,500            | 2,737,500            | 2,737,500            | 2,737,500            | 2,737,500            | 2,737,500            |
| Days-In-Service                                | Input "0" for OOS                                                                                                | t <sub>IS</sub>      | days                       | = User specified                                                                                                                                                                                                                                                                                                                                                                                               | 31                   | 28                   | 31                   | 30                   | 31                   | 30                   | 31                   | 31                   |
| Shell Clingage Factor                          |                                                                                                                  | C <sub>S</sub>       | bbl / 1000 ft <sup>2</sup> | {Table 7.1-10}                                                                                                                                                                                                                                                                                                                                                                                                 | 0.0015               | 0.0015               | 0.0015               | 0.0015               | 0.0015               | 0.0015               | 0.0015               | 0.0015               |
| Total Deck Fitting Loss Factor                 | Eqn. 2-6                                                                                                         | F <sub>F</sub>       | lb-mole/yr                 | $= [(N_{F1} * K_{F1}) + (N_{F2} * K_{F2}) + \dots + (N_{Fnl} * K_{Fnl})]$ {Eqn. 2-6}                                                                                                                                                                                                                                                                                                                           | 231.2                | 229.4                | 231.2                | 225.6                | 200.5                | 185.4                | 174.2                | 166.5                |
| Daily Total Solar Insolation Factor            |                                                                                                                  | I                    | Btu / ft <sup>2</sup> day  |                                                                                                                                                                                                                                                                                                                                                                                                                | 552                  | 794                  | 1,117                | 1,452                | 1,736                | 1,922                | 1,881                | 1,663                |
| Product Factor                                 | Eqn. 2-3                                                                                                         | K <sub>C</sub>       |                            | = 0.4 {crude oils}<br>= 1.0 {all other org. liquids}                                                                                                                                                                                                                                                                                                                                                           | 1.0                  | 1.0                  | 1.0                  | 1.0                  | 1.0                  | 1.0                  | 1.0                  | 1.0                  |
| Deck Seam Loss per Unit Seam Length Factor     | Converted K <sub>D</sub> into monthly emissions by scaling by the time in service for the month.                 | K <sub>D</sub>       | lb-mole / ft-month         | = 0.0 {IFR Tank with welded deck and all EFR Tanks}<br>= 0.14 * t <sub>IS</sub> / t <sub>yr</sub> {bolted deck}                                                                                                                                                                                                                                                                                                | 0.000                | 0.000                | 0.000                | 0.000                | 0.000                | 0.000                | 0.000                | 0.000                |
| Vapor Molecular Weight                         | When using full speciation profiles, calculated as the weighted average of the M of each component.              | M <sub>V</sub>       | lb/lb-mole                 | = VOL data of tank contents {partial speciation}<br>$M_V = \sum (M_{Vi} * (P_{VA,Ti} / P_{VA,Ta}))$                                                                                                                                                                                                                                                                                                            | 62.0                 | 62.0                 | 62.0                 | 62.0                 | 62.0                 | 62.0                 | 62.0                 | 62.0                 |
| Liquid Molecular Weight                        |                                                                                                                  | M <sub>L</sub>       | lb/lb-mole                 | $M_L = 1 / \sum (Z_{Li} / M_{Li})$ {full speciation, Eqn. 1-22}                                                                                                                                                                                                                                                                                                                                                | 92.0                 | 92.0                 | 92.0                 | 92.0                 | 92.0                 | 92.0                 | 92.0                 | 92.0                 |
| Liquid Density at 60 °F                        |                                                                                                                  | W <sub>L</sub>       | lb/gal                     | = VOL data of tank contents {partial speciation}<br>= $\sum (M_{Li} * Z_{Li})$ {full speciation, Eqn. 1-22}                                                                                                                                                                                                                                                                                                    | 5.60                 | 5.60                 | 5.60                 | 5.60                 | 5.60                 | 5.60                 | 5.60                 | 5.60                 |
| Average Daily Minimum Ambient Temperature      |                                                                                                                  | T <sub>AN</sub>      | °F                         |                                                                                                                                                                                                                                                                                                                                                                                                                | 18.50                | 20.30                | 29.80                | 38.80                | 48.40                | 56.90                | 61.60                | 60.20                |
| Average Daily Maximum Ambient Temperature      |                                                                                                                  | T <sub>AX</sub>      | °F                         |                                                                                                                                                                                                                                                                                                                                                                                                                | 33.70                | 36.90                | 49.00                | 60.30                | 70.60                | 78.90                | 82.60                | 80.80                |
| Daily Average Ambient Temperature              |                                                                                                                  | T <sub>AA</sub>      | °F                         | = (T <sub>AX</sub> + T <sub>AN</sub> ) / 2 {Eqn. 1-27}                                                                                                                                                                                                                                                                                                                                                         | 26.10                | 28.60                | 39.40                | 49.55                | 59.50                | 67.90                | 72.10                | 70.50                |
| Daily Average Liquid Surf. Temperature         | Constant 0.0079 has units of (°R-ft <sup>2</sup> -day/btu).                                                      | T <sub>LA</sub>      | °F                         | = (0.44 * T <sub>AA</sub> ) + (0.56 * T <sub>B</sub> ) + (0.0079 * α <sub>Tot</sub> * I) {Eqn. 1-26}                                                                                                                                                                                                                                                                                                           | 26.85                | 29.68                | 40.91                | 51.51                | 61.84                | 70.49                | 74.64                | 72.74                |
| Liquid Bulk Temperature                        | If T <sub>B</sub> is unknown, see AP-42 7.1-23 Note 3. Not included here as T <sub>B</sub> is always calculated. | T <sub>B</sub>       | degrees F                  | = specified by user {heated tanks only}<br>= T <sub>AA</sub> + 6 * α <sub>Tot</sub> - 1 {Eqn. 1-28}                                                                                                                                                                                                                                                                                                            | 26.12                | 28.62                | 39.42                | 49.57                | 59.52                | 67.92                | 72.12                | 70.52                |
| Vapor Pressure at Daily Av. Liquid Surf. Temp. | Used for speciated emissions and most vapor pressures. P <sub>VA,Ta</sub> uses T <sub>LA</sub> .                 | P <sub>VA,Ta</sub>   | psia                       | {full speciation profiles, Eqn. 1-22}: Sum of partial true vapor pressures components.<br>{partial/no speciation profiles}: Vapor pressures at T (°F) based on P <sub>VA</sub> values in VOLs tab at ΔT (°F) increments by interpolating between the P <sub>VA</sub> values at the next highest/lowest T.<br>$P_{VA,T} = (T - T_{Low}) / (T_{High} - T_{Low}) * (P_{VA,T,High} - P_{VA,T,Low}) + P_{VA,T,Low}$ | 3.5872               | 3.8085               | 4.7996               | 5.9147               | 7.1915               | 8.4206               | 9.0657               | 8.7664               |
| Vapor Pressure at Daily Av. Liquid Bulk Temp.  | Used for vapor space expansion factor. P <sub>VA,Tb</sub> uses T <sub>B</sub> .                                  | P <sub>VA,Tb</sub>   | psia                       | {full speciation profiles, Eqn. 1-22}: Sum of partial true vapor pressures components.<br>{partial/no speciation profiles}: Vapor pressures at T (°F) based on P <sub>VA</sub> values in VOLs tab at ΔT (°F) increments by interpolating between the P <sub>VA</sub> values at the next highest/lowest T.<br>$P_{VA,T} = (T - T_{Low}) / (T_{High} - T_{Low}) * (P_{VA,T,High} - P_{VA,T,Low}) + P_{VA,T,Low}$ | 3.5316               | 3.7244               | 4.6572               | 5.6964               | 6.8870               | 8.0390               | 8.6695               | 8.4248               |
| Vapor Pressure Function                        | Use T <sub>B</sub> for calculating P <sub>VA</sub> per Eqn. 2-3 Note 3.                                          | P <sub>f</sub>       |                            | = (P <sub>VA,Tb</sub> / P <sub>A</sub> ) / (1 + (1 - P <sub>VA,Tb</sub> / P <sub>A</sub> ) <sup>0.5</sup> ) <sup>2</sup> {Eqn. 2-3}                                                                                                                                                                                                                                                                            | 0.0719               | 0.0765               | 0.0998               | 0.1286               | 0.1659               | 0.2078               | 0.2339               | 0.2235               |
| Average Ambient Wind Speed                     | Monthly Average                                                                                                  | v                    | mph                        | = 0 {Domed EFR and all IFR tanks, Eqn. 2-3 Note 3}                                                                                                                                                                                                                                                                                                                                                             | 10.6                 | 10.5                 | 10.6                 | 10.3                 | 8.9                  | 8.0                  | 7.3                  | 6.8                  |
| Rim Seal Loss                                  |                                                                                                                  | L <sub>R</sub>       | lb/month                   | = (K <sub>Ra</sub> + K <sub>Rb</sub> * v <sup>3</sup> ) * D * P <sub>f</sub> * M <sub>V</sub> * K <sub>C</sub> * t <sub>IS</sub> / t <sub>yr</sub> {Eqn. 2-2}                                                                                                                                                                                                                                                  | 122.78               | 116.97               | 170.45               | 207.18               | 243.46               | 269.61               | 290.45               | 261.74               |
| Withdrawal Loss                                | Constant 0.943 has units of (1,000 ft <sup>3</sup> gal / bbl <sup>2</sup> )                                      | L <sub>WD</sub>      | lb/month                   | = 0.943 * (Q / (42 gal/bbl)) * C <sub>S</sub> * W <sub>L</sub> / D * (1 + (N <sub>Col</sub> * F <sub>C</sub> / D)) {Eqn. 2-4}                                                                                                                                                                                                                                                                                  | 7.71                 | 7.71                 | 7.71                 | 7.71                 | 7.71                 | 7.71                 | 7.71                 | 7.71                 |
| Deck Fitting Loss                              |                                                                                                                  | L <sub>F</sub>       | lb/month                   | = F <sub>F</sub> * P <sub>f</sub> * M <sub>V</sub> * K <sub>C</sub> * t <sub>IS</sub> / t <sub>yr</sub> {Eqn. 2-5}                                                                                                                                                                                                                                                                                             | 87.55                | 83.43                | 121.55               | 147.82               | 175.18               | 196.35               | 214.56               | 195.96               |
| Deck Seam Loss                                 |                                                                                                                  | L <sub>D</sub>       | lb/month                   | = 0 {welded IFR and all EFR tanks}<br>= K <sub>D</sub> * S <sub>D</sub> * D <sup>2</sup> * P <sub>f</sub> * M <sub>V</sub> * K <sub>C</sub> {Eqn. 2-9}                                                                                                                                                                                                                                                         | 0.00                 | 0.00                 | 0.00                 | 0.00                 | 0.00                 | 0.00                 | 0.00                 | 0.00                 |
| <b>Total Emission from Normal Operation</b>    |                                                                                                                  | <b>L<sub>T</sub></b> | <b>lb/month</b>            | <b>= L<sub>R</sub> + L<sub>WD</sub> + L<sub>F</sub> + L<sub>D</sub> {Eqn. 2-1}</b>                                                                                                                                                                                                                                                                                                                             | <b>218.03</b>        | <b>208.11</b>        | <b>299.71</b>        | <b>362.70</b>        | <b>426.34</b>        | <b>473.66</b>        | <b>512.72</b>        | <b>465.41</b>        |



| Calculations                                   |                                                                                                      | 9                    | 10                   | 11                   | 12                   |
|------------------------------------------------|------------------------------------------------------------------------------------------------------|----------------------|----------------------|----------------------|----------------------|
| Parameter Title                                | Notes                                                                                                | Sep                  | Oct                  | Nov                  | Dec                  |
| <b>Service</b>                                 |                                                                                                      | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  |
| Type of Substance                              | Select Organic Liquid, Petroleum Distillate, or Crude Oil                                            | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate |
| Contents of Tank                               | Select from list (add new compounds in 'VOLs' tab):                                                  | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    |
| Speciation Profile                             | Select from list (add new in 'Speciation Input' tab):                                                | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    |
| Speciation Profile Type                        |                                                                                                      | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   |
| Monthly Throughput                             |                                                                                                      | 2,737,500            | 2,737,500            | 2,737,500            | 2,737,500            |
| Days-In-Service                                | Input "0" for OOS                                                                                    | 30                   | 31                   | 30                   | 31                   |
| Shell Clingage Factor                          |                                                                                                      | 0.0015               | 0.0015               | 0.0015               | 0.0015               |
| Total Deck Fitting Loss Factor                 | Eqn. 2-6                                                                                             | 175.8                | 192.0                | 216.5                | 225.6                |
| Daily Total Solar Insolation Factor            |                                                                                                      | 1,333                | 959                  | 581                  | 446                  |
| Product Factor                                 | Eqn. 2-3                                                                                             | 1.0                  | 1.0                  | 1.0                  | 1.0                  |
| Deck Seam Loss per Unit Seam Length Factor     | Converted $K_D$ into monthly emissions by scaling by the time in service for the month.              | 0.000                | 0.000                | 0.000                | 0.000                |
| Vapor Molecular Weight                         |                                                                                                      | 62.0                 | 62.0                 | 62.0                 | 62.0                 |
| Liquid Molecular Weight                        | When using full speciation profiles, calculated as the weighted average of the M of each component.  | 92.0                 | 92.0                 | 92.0                 | 92.0                 |
| Liquid Density at 60 °F                        |                                                                                                      | 5.60                 | 5.60                 | 5.60                 | 5.60                 |
| Average Daily Minimum Ambient Temperature      |                                                                                                      | 53.50                | 42.30                | 34.10                | 24.40                |
| Average Daily Maximum Ambient Temperature      |                                                                                                      | 74.30                | 62.50                | 50.40                | 38.60                |
| Daily Average Ambient Temperature              |                                                                                                      | 63.90                | 52.40                | 42.25                | 31.50                |
| Daily Average Liquid Surf. Temperature         | Constant 0.0079 has units of ( $^{\circ}\text{R} \cdot \text{ft}^2 \cdot \text{day} / \text{btu}$ ). | 65.70                | 53.70                | 43.04                | 32.11                |
| Liquid Bulk Temperature                        | If $T_B$ is unknown, see AP-42 7.1-23 Note 3. Not included here as $T_B$ is always calculated.       | 63.92                | 52.42                | 42.27                | 31.52                |
| Vapor Pressure at Daily Av. Liquid Surf. Temp. | Used for speciated emissions and most vapor pressures. $P_{VA, T_{LA}}$ uses $T_{LA}$ .              | 7.7208               | 6.1687               | 5.0088               | 4.0077               |
| Vapor Pressure at Daily Av. Liquid Bulk Temp.  | Used for vapor space expansion factor. $P_{VA, T_B}$ uses $T_B$ .                                    | 7.4728               | 6.0192               | 4.9322               | 3.9585               |
| Vapor Pressure Function                        | Use $T_B$ for calculating $P_{VA}$ per Eqn. 2-3 Note 3.                                              | 0.1864               | 0.1382               | 0.1071               | 0.0821               |
| Average Ambient Wind Speed                     | Monthly Average                                                                                      | 7.4                  | 8.4                  | 9.8                  | 10.3                 |
| Rim Seal Loss                                  |                                                                                                      | 226.53               | 193.04               | 165.32               | 136.79               |
| Withdrawal Loss                                | Constant 0.943 has units of ( $1,000 \text{ ft}^3 \text{ gal} / \text{bbf}^2$ )                      | 7.71                 | 7.71                 | 7.71                 | 7.71                 |
| Deck Fitting Loss                              |                                                                                                      | 166.95               | 139.72               | 118.17               | 97.59                |
| Deck Seam Loss                                 |                                                                                                      | 0.00                 | 0.00                 | 0.00                 | 0.00                 |
| <b>Total Emission from Normal Operation</b>    |                                                                                                      | <b>401.19</b>        | <b>340.47</b>        | <b>291.19</b>        | <b>242.09</b>        |

**Floating Roof Tank Emissions**

Based on AP-42, November 2006, Section 7.1.3.2.

Tool Last Updated: 12/14/15 [Click Here to Go Back to Cover Page](#)

|                       |      |
|-----------------------|------|
| <b>Reporting Year</b> | 2017 |
|-----------------------|------|

| Tank Reference Parameters         |                                                                       |                        |                                  |                             |
|-----------------------------------|-----------------------------------------------------------------------|------------------------|----------------------------------|-----------------------------|
| Parameter Title                   | Notes                                                                 | Parameter Symbol       | Units                            | Value                       |
| Tank ID                           | Enter only Tank ID in this tab.                                       |                        |                                  | 4070S2                      |
| Tank Name                         |                                                                       | TK <sub>name</sub>     |                                  | Ethanol Scenario 2 New      |
| Actual Location                   |                                                                       | LOC <sub>Act</sub>     |                                  | Newell, West Virginia       |
| Location for Calculation Purposes |                                                                       | LOC <sub>Calc</sub>    |                                  | Pittsburgh, Pennsylvania    |
| Tank Roof Type                    |                                                                       | TK <sub>roof</sub>     |                                  | IFR - Column Supported Roof |
| Normal Capacity                   |                                                                       | Cap                    | gal                              | 630,000                     |
| Diameter                          |                                                                       | D                      | ft                               | 48.0                        |
| Shell Height or Length            |                                                                       | H <sub>s</sub>         | ft                               | 48.0                        |
| External Shell Color              |                                                                       | SC <sub>ext</sub>      |                                  | White                       |
| External Shell Paint Condition    |                                                                       | PC <sub>Shell</sub>    |                                  | Good                        |
| Roof Color/Shade                  |                                                                       | RC                     |                                  | White                       |
| Roof Paint Condition              |                                                                       | PC <sub>Roof</sub>     |                                  | Good                        |
| Tank Shell Solar Absorbance       |                                                                       | α <sub>Shell</sub>     |                                  | 0.17                        |
| Tank Roof Paint Solar Absorbance  |                                                                       | α <sub>Roof</sub>      |                                  | 0.17                        |
| Total Tank Paint Solar Absorbance | = (α <sub>Shell</sub> + α <sub>Roof</sub> ) / 2 {Note A, Table 7.1-6} | α <sub>Tot</sub>       |                                  | 0.17                        |
| Ideal Gas Constant,               |                                                                       | R                      | psia ft <sup>3</sup> / lbmole °R | 10.731                      |
| Ambient Pressure                  |                                                                       | P <sub>A</sub>         | psia                             | 14.109                      |
| Rim-Seal System                   |                                                                       | TK <sub>RimSeal</sub>  |                                  | Mechanical-shoe/Rim-mounted |
| Tank Fittings                     |                                                                       | TK <sub>Fittings</sub> |                                  | Detail                      |

| Floating Roof Parameters                    |                                                                                                                                                                                                                                                                                  |                         |                                   |            |
|---------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------------------|------------|
| Parameter Title                             | Notes                                                                                                                                                                                                                                                                            | Parameter Symbol        | Units                             | Value      |
| Heated Tank?                                |                                                                                                                                                                                                                                                                                  | HT                      |                                   | No         |
| Liquid Bulk Temperature                     | Heated Tanks Only                                                                                                                                                                                                                                                                | T <sub>B</sub>          | Degrees F                         | --         |
| Number of fixed roof support columns        |                                                                                                                                                                                                                                                                                  | N <sub>Col</sub>        |                                   | 1          |
| Effective Column Diameter                   | 1.1 for 9" by 7" built-up column<br>0.7 for 8" diameter pipe column<br>1.0 for unknown pipe column                                                                                                                                                                               | F <sub>C</sub>          | (col perimeter/π) ft              | 1.0        |
| Internal Shell Condition                    |                                                                                                                                                                                                                                                                                  | SC <sub>int</sub>       |                                   | Light Rust |
| Tank Construction                           |                                                                                                                                                                                                                                                                                  | TK <sub>Const</sub>     |                                   | --         |
| Deck Type                                   |                                                                                                                                                                                                                                                                                  | TK <sub>Deck</sub>      |                                   | Welded     |
| Total Length of Deck Seams                  |                                                                                                                                                                                                                                                                                  | L <sub>Seam</sub>       | ft                                | --         |
| Area of deck                                | = π * D <sup>2</sup> / 4 {Eqn. 2-9}<br>= L <sub>Seam</sub> / A <sub>deck</sub> {Eqn. 2-9}                                                                                                                                                                                        | A <sub>deck</sub>       | ft <sup>2</sup>                   | 1,809.6    |
| Deck Seam Length Factor                     | = 0.20 ft/ft <sup>2</sup> (5' wide sheet)<br>= 0.17 ft/ft <sup>2</sup> (6' wide sheet)<br>= 0.14 ft/ft <sup>2</sup> (7' wide sheet)<br>= 0.33 ft/ft <sup>2</sup> (5' x 7.5' panels)<br>= 0.28 ft/ft <sup>2</sup> (5' 12' panels)<br>= 0.20 ft/ft <sup>2</sup> (most common type) | S <sub>D</sub>          | ft/ft <sup>2</sup>                | --         |
| Deck Construction (IFR w/Bolted Decks Only) | Not applicable if L <sub>Seam</sub> specified.                                                                                                                                                                                                                                   | TK <sub>DeckConst</sub> |                                   | --         |
| Zero wind speed rim seal loss factor        | AP-42 Table 7.1-8                                                                                                                                                                                                                                                                | K <sub>RA</sub>         | lb-mole/ft-yr                     | 0.6        |
| Wind speed dependent rim seal loss factor   | AP-42 Table 7.1-8                                                                                                                                                                                                                                                                | K <sub>RB</sub>         | lb-mole/(mph) <sup>3</sup> -ft-yr | 0.4        |
| Fitting Wind Speed Correction Factor        | = 0.7 {EFR Tanks Only}<br>= 0.0 {IFR and Domed EFR Tanks Only} {Eqn. 2-7}                                                                                                                                                                                                        | K <sub>V</sub>          |                                   | 0.0        |
| Seal related wind speed exponent            |                                                                                                                                                                                                                                                                                  | n                       |                                   | 1.0        |
| Days per Year                               | For leap years, days = 366                                                                                                                                                                                                                                                       | t <sub>yr</sub>         | days/yr                           | 365        |

| Emission Summary       |                            |                  |       |
|------------------------|----------------------------|------------------|-------|
| Annual Throughput, gal | 7,121,952                  | Annual Turnovers | 11.30 |
| Annual Emissions, tons | 0.06                       |                  |       |
| Month                  | Normal Operation Loss, lbs | Emissions, tpy   |       |
| Jan                    | 5.45                       | 0.003            |       |
| Feb                    | 5.42                       | 0.003            |       |
| Mar                    | 7.02                       | 0.004            |       |
| Apr                    | 8.56                       | 0.004            |       |
| May                    | 11.05                      | 0.006            |       |
| Jun                    | 13.26                      | 0.007            |       |
| Jul                    | 15.14                      | 0.008            |       |
| Aug                    | 14.54                      | 0.007            |       |
| Sep                    | 12.01                      | 0.006            |       |
| Oct                    | 9.35                       | 0.005            |       |
| Nov                    | 7.31                       | 0.004            |       |
| Dec                    | 6.01                       | 0.0030           |       |

Note: The emission summary table is pulled into the Tank Emissions tab using cell references A31:B42. The emission summary must remain at this cell reference to function properly.

| Calculations                                   |                                                                                                                  |                      |                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1                             | 2                             | 3                             | 4                             | 5                             | 6                             | 7                             | 8                             |
|------------------------------------------------|------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|
| Parameter Title                                | Notes                                                                                                            | Parameter Symbol     | Units                      | Reference or Equation                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Jan                           | Feb                           | Mar                           | Apr                           | May                           | Jun                           | Jul                           | Aug                           |
| <b>Service</b>                                 |                                                                                                                  |                      |                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Main Service</b>           | <b>Main Service</b>           | <b>Main Service</b>           | <b>Main Service</b>           | <b>Main Service</b>           | <b>Main Service</b>           | <b>Main Service</b>           | <b>Main Service</b>           |
| Type of Substance                              | Select Organic Liquid, Petroleum Distillate, or Crude Oil                                                        |                      |                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Organic Liquid                | Organic Liquid                | Organic Liquid                | Organic Liquid                | Organic Liquid                | Organic Liquid                | Organic Liquid                | Organic Liquid                |
| Contents of Tank                               | Select from list (add new compounds in 'VOLs' tab):                                                              |                      |                            | = User specified                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Ethyl alcohol                 | Ethyl alcohol                 | Ethyl alcohol                 | Ethyl alcohol                 | Ethyl alcohol                 | Ethyl alcohol                 | Ethyl alcohol                 | Ethyl alcohol                 |
| Speciation Profile                             | Select from list (add new in 'Speciation Input' tab):                                                            |                      |                            | = User specified                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Ethanol with Natural Gasoline | Ethanol with Natural Gasoline | Ethanol with Natural Gasoline | Ethanol with Natural Gasoline | Ethanol with Natural Gasoline | Ethanol with Natural Gasoline | Ethanol with Natural Gasoline | Ethanol with Natural Gasoline |
| Speciation Profile Type                        |                                                                                                                  |                      |                            | = User specified                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Full Speciation               | Full Speciation               | Full Speciation               | Full Speciation               | Full Speciation               | Full Speciation               | Full Speciation               | Full Speciation               |
| Monthly Throughput                             |                                                                                                                  | Q                    | gal/month                  | = User specified                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 593,496                       | 593,496                       | 593,496                       | 593,496                       | 593,496                       | 593,496                       | 593,496                       | 593,496                       |
| Days-In-Service                                | Input "0" for OOS                                                                                                | t <sub>IS</sub>      | days                       | = User specified                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 31                            | 28                            | 31                            | 30                            | 31                            | 30                            | 31                            | 31                            |
| Shell Clingage Factor                          |                                                                                                                  | C <sub>S</sub>       | bbl / 1000 ft <sup>2</sup> | {Table 7.1-10}                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 0.0015                        | 0.0015                        | 0.0015                        | 0.0015                        | 0.0015                        | 0.0015                        | 0.0015                        | 0.0015                        |
| Total Deck Fitting Loss Factor                 | Eqn. 2-6                                                                                                         | F <sub>F</sub>       | lb-mole/yr                 | = [(N <sub>F1</sub> * K <sub>F1</sub> ) + (N <sub>F2</sub> * K <sub>F2</sub> ) + ... + (N <sub>Fn</sub> * K <sub>Fn</sub> )] {Eqn. 2-6}                                                                                                                                                                                                                                                                                                                                        | 110.6                         | 110.6                         | 110.6                         | 110.6                         | 110.6                         | 110.6                         | 110.6                         | 110.6                         |
| Daily Total Solar Insolation Factor            |                                                                                                                  | I                    | Btu / ft <sup>2</sup> day  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 552                           | 794                           | 1,117                         | 1,452                         | 1,736                         | 1,922                         | 1,881                         | 1,663                         |
| Product Factor                                 | Eqn. 2-3                                                                                                         | K <sub>C</sub>       |                            | = 0.4 {crude oils}<br>= 1.0 {all other org. liquids}                                                                                                                                                                                                                                                                                                                                                                                                                           | 1.0                           | 1.0                           | 1.0                           | 1.0                           | 1.0                           | 1.0                           | 1.0                           | 1.0                           |
| Deck Seam Loss per Unit Seam Length Factor     | Converted K <sub>D</sub> into monthly emissions by scaling by the time in service for the month.                 | K <sub>D</sub>       | lb-mole / ft-month         | = 0.0 {IFR Tank with welded deck and all EFR Tanks}<br>= 0.14 * t <sub>IS</sub> / t <sub>yr</sub> {bolted deck}                                                                                                                                                                                                                                                                                                                                                                | 0.000                         | 0.000                         | 0.000                         | 0.000                         | 0.000                         | 0.000                         | 0.000                         | 0.000                         |
| Vapor Molecular Weight                         | When using full speciation profiles, calculated as the weighted average of the M of each component.              | M <sub>V</sub>       | lb/lb-mole                 | = VOL data of tank contents {partial speciation}<br>M <sub>V</sub> = Σ (M <sub>Vi</sub> * (P <sub>VA,Ti</sub> / P <sub>VA,Tia</sub> ))                                                                                                                                                                                                                                                                                                                                         | 52.6                          | 52.4                          | 51.7                          | 51.1                          | 50.6                          | 50.3                          | 50.1                          | 50.2                          |
| Liquid Molecular Weight                        |                                                                                                                  | M <sub>L</sub>       | lb/lb-mole                 | M <sub>L</sub> = 1 / Σ (Z <sub>Li</sub> / M <sub>Li</sub> ) {full speciation, Eqn. 1-22}                                                                                                                                                                                                                                                                                                                                                                                       | 47.1                          | 47.1                          | 47.1                          | 47.1                          | 47.1                          | 47.1                          | 47.1                          | 47.1                          |
| Liquid Density at 60 °F                        |                                                                                                                  | W <sub>L</sub>       | lb/gal                     | = VOL data of tank contents {partial speciation}<br>= Σ (M <sub>Li</sub> * Z <sub>Li</sub> ) {full speciation, Eqn. 1-22}                                                                                                                                                                                                                                                                                                                                                      | 6.55                          | 6.55                          | 6.55                          | 6.55                          | 6.55                          | 6.55                          | 6.55                          | 6.55                          |
| Average Daily Minimum Ambient Temperature      |                                                                                                                  | T <sub>AN</sub>      | °F                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 18.50                         | 20.30                         | 29.80                         | 38.80                         | 48.40                         | 56.90                         | 61.60                         | 60.20                         |
| Average Daily Maximum Ambient Temperature      |                                                                                                                  | T <sub>AX</sub>      | °F                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 33.70                         | 36.90                         | 49.00                         | 60.30                         | 70.60                         | 78.90                         | 82.60                         | 80.80                         |
| Daily Average Ambient Temperature              |                                                                                                                  | T <sub>AA</sub>      | °F                         | = (T <sub>AX</sub> + T <sub>AN</sub> ) / 2 {Eqn. 1-27}                                                                                                                                                                                                                                                                                                                                                                                                                         | 26.10                         | 28.60                         | 39.40                         | 49.55                         | 59.50                         | 67.90                         | 72.10                         | 70.50                         |
| Daily Average Liquid Surf. Temperature         | Constant 0.0079 has units of (°R-ft <sup>2</sup> -day/btu).                                                      | T <sub>LA</sub>      | °F                         | = (0.44 * T <sub>AA</sub> ) + (0.56 * T <sub>B</sub> ) + (0.0079 * α <sub>Tot</sub> * I) {Eqn. 1-26}                                                                                                                                                                                                                                                                                                                                                                           | 26.85                         | 29.68                         | 40.91                         | 51.51                         | 61.84                         | 70.49                         | 74.64                         | 72.74                         |
| Liquid Bulk Temperature                        | If T <sub>B</sub> is unknown, see AP-42 7.1-23 Note 3. Not included here as T <sub>B</sub> is always calculated. | T <sub>B</sub>       | degrees F                  | = specified by user {heated tanks only}<br>= T <sub>AA</sub> + 6 * α <sub>Tot</sub> - 1 {Eqn. 1-28}                                                                                                                                                                                                                                                                                                                                                                            | 26.12                         | 28.62                         | 39.42                         | 49.57                         | 59.52                         | 67.92                         | 72.12                         | 70.52                         |
| Vapor Pressure at Daily Av. Liquid Surf. Temp. | Used for speciated emissions and most vapor pressures. P <sub>VA,Tia</sub> uses T <sub>LA</sub> .                | P <sub>VA,Tia</sub>  | psia                       | {full speciation profiles, Eqn. 1-22}: Sum of partial true vapor pressures components.<br>{partial/no speciation profiles}: Vapor pressures at T (°F) based on P <sub>VA</sub> values in VOLs tab at ΔT (°F) increments by interpolating between the P <sub>VA</sub> values at the next highest/lowest T.<br>P <sub>VA,T</sub> = (T - T <sub>Low</sub> ) / (T <sub>High</sub> - T <sub>Low</sub> ) * (P <sub>VA,T,High</sub> - P <sub>VA,T,Low</sub> ) + P <sub>VA,T,Low</sub> | 0.2464                        | 0.2730                        | 0.4062                        | 0.5823                        | 0.8163                        | 1.0726                        | 1.2188                        | 1.1500                        |
| Vapor Pressure at Daily Av. Liquid Bulk Temp.  | Used for vapor space expansion factor. P <sub>VA,Tb</sub> uses T <sub>B</sub> .                                  | P <sub>VA,Tb</sub>   | psia                       | {full speciation profiles, Eqn. 1-22}: Sum of partial true vapor pressures components.<br>{partial/no speciation profiles}: Vapor pressures at T (°F) based on P <sub>VA</sub> values in VOLs tab at ΔT (°F) increments by interpolating between the P <sub>VA</sub> values at the next highest/lowest T.<br>P <sub>VA,T</sub> = (T - T <sub>Low</sub> ) / (T <sub>High</sub> - T <sub>Low</sub> ) * (P <sub>VA,T,High</sub> - P <sub>VA,T,Low</sub> ) + P <sub>VA,T,Low</sub> | 0.2399                        | 0.2627                        | 0.3856                        | 0.5457                        | 0.7574                        | 0.9898                        | 1.1280                        | 1.0735                        |
| Vapor Pressure Function                        | Use T <sub>B</sub> for calculating P <sub>VA</sub> per Eqn. 2-3 Note 3.                                          | P <sub>f</sub>       |                            | = (P <sub>VA,Tb</sub> / P <sub>A</sub> ) / (1 + (1 - P <sub>VA,Tb</sub> / P <sub>A</sub> ) <sup>0.5</sup> ) <sup>2</sup> {Eqn. 2-3}                                                                                                                                                                                                                                                                                                                                            | 0.0043                        | 0.0047                        | 0.0069                        | 0.0099                        | 0.0138                        | 0.0182                        | 0.0208                        | 0.0198                        |
| Average Ambient Wind Speed                     | Monthly Average                                                                                                  | v                    | mph                        | = 0 {Domed EFR and all IFR tanks, Eqn. 2-3 Note 3}                                                                                                                                                                                                                                                                                                                                                                                                                             | 0.0                           | 0.0                           | 0.0                           | 0.0                           | 0.0                           | 0.0                           | 0.0                           | 0.0                           |
| Rim Seal Loss                                  |                                                                                                                  | L <sub>R</sub>       | lb/month                   | = (K <sub>Ra</sub> + K <sub>Rb</sub> * v <sup>0.5</sup> ) * D * P <sub>f</sub> * M <sub>V</sub> * K <sub>C</sub> * t <sub>IS</sub> / t <sub>yr</sub> {Eqn. 2-2}                                                                                                                                                                                                                                                                                                                | 0.55                          | 0.54                          | 0.88                          | 1.19                          | 1.71                          | 2.16                          | 2.55                          | 2.43                          |
| Withdrawal Loss                                | Constant 0.943 has units of (1,000 ft <sup>3</sup> gal / bbl <sup>2</sup> )                                      | L <sub>WD</sub>      | lb/month                   | = 0.943 * (Q / (42 gal/bbl)) * C <sub>S</sub> * W <sub>L</sub> / D * (1 + (N <sub>Col</sub> * F <sub>C</sub> / D)) {Eqn. 2-4}                                                                                                                                                                                                                                                                                                                                                  | 2.78                          | 2.78                          | 2.78                          | 2.78                          | 2.78                          | 2.78                          | 2.78                          | 2.78                          |
| Deck Fitting Loss                              |                                                                                                                  | L <sub>F</sub>       | lb/month                   | = F <sub>F</sub> * P <sub>f</sub> * M <sub>V</sub> * K <sub>C</sub> * t <sub>IS</sub> / t <sub>yr</sub> {Eqn. 2-5}                                                                                                                                                                                                                                                                                                                                                             | 2.12                          | 2.09                          | 3.36                          | 4.58                          | 6.56                          | 8.31                          | 9.80                          | 9.32                          |
| Deck Seam Loss                                 |                                                                                                                  | L <sub>D</sub>       | lb/month                   | = 0 {welded IFR and all EFR tanks}<br>= K <sub>D</sub> * S <sub>D</sub> * D <sup>2</sup> * P <sub>f</sub> * M <sub>V</sub> * K <sub>C</sub> {Eqn. 2-9}                                                                                                                                                                                                                                                                                                                         | 0.00                          | 0.00                          | 0.00                          | 0.00                          | 0.00                          | 0.00                          | 0.00                          | 0.00                          |
| <b>Total Emission from Normal Operation</b>    |                                                                                                                  | <b>L<sub>T</sub></b> | <b>lb/month</b>            | <b>= L<sub>R</sub> + L<sub>WD</sub> + L<sub>F</sub> + L<sub>D</sub> {Eqn. 2-1}</b>                                                                                                                                                                                                                                                                                                                                                                                             | <b>5.45</b>                   | <b>5.42</b>                   | <b>7.02</b>                   | <b>8.56</b>                   | <b>11.05</b>                  | <b>13.26</b>                  | <b>15.14</b>                  | <b>14.54</b>                  |

| Calculati                                      |                                                                                                     | 9                             | 10                            | 11                            | 12                            |
|------------------------------------------------|-----------------------------------------------------------------------------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|
| Parameter Title                                | Notes                                                                                               | Sep                           | Oct                           | Nov                           | Dec                           |
| Service                                        |                                                                                                     | Main Service                  | Main Service                  | Main Service                  | Main Service                  |
| Type of Substance                              | Select Organic Liquid, Petroleum Distillate, or Crude Oil                                           | Organic Liquid                | Organic Liquid                | Organic Liquid                | Organic Liquid                |
| Contents of Tank                               | Select from list (add new compounds in 'VOLs' tab):                                                 | Ethyl alcohol                 | Ethyl alcohol                 | Ethyl alcohol                 | Ethyl alcohol                 |
| Speciation Profile                             | Select from list (add new in 'Speciation Input' tab):                                               | Ethanol with Natural Gasoline | Ethanol with Natural Gasoline | Ethanol with Natural Gasoline | Ethanol with Natural Gasoline |
| Speciation Profile Type                        |                                                                                                     | Full Speciation               | Full Speciation               | Full Speciation               | Full Speciation               |
| Monthly Throughput                             |                                                                                                     | 593,496                       | 593,496                       | 593,496                       | 593,496                       |
| Days-In-Service                                | Input "0" for OOS                                                                                   | 30                            | 31                            | 30                            | 31                            |
| Shell Clingage Factor                          |                                                                                                     | 0.0015                        | 0.0015                        | 0.0015                        | 0.0015                        |
| Total Deck Fitting Loss Factor                 | Eqn. 2-6                                                                                            | 110.6                         | 110.6                         | 110.6                         | 110.6                         |
| Daily Total Solar Insolation Factor            |                                                                                                     | 1,333                         | 959                           | 581                           | 446                           |
| Product Factor                                 | Eqn. 2-3                                                                                            | 1.0                           | 1.0                           | 1.0                           | 1.0                           |
| Deck Seam Loss per Unit Seam Length Factor     | Converted $K_D$ into monthly emissions by scaling by the time in service for the month.             | 0.000                         | 0.000                         | 0.000                         | 0.000                         |
| Vapor Molecular Weight                         | When using full speciation profiles, calculated as the weighted average of the M of each component. | 50.5                          | 51.0                          | 51.6                          | 52.2                          |
| Liquid Molecular Weight                        |                                                                                                     | 47.1                          | 47.1                          | 47.1                          | 47.1                          |
| Liquid Density at 60 °F                        |                                                                                                     | 6.55                          | 6.55                          | 6.55                          | 6.55                          |
| Average Daily Minimum Ambient Temperature      |                                                                                                     | 53.50                         | 42.30                         | 34.10                         | 24.40                         |
| Average Daily Maximum Ambient Temperature      |                                                                                                     | 74.30                         | 62.50                         | 50.40                         | 38.60                         |
| Daily Average Ambient Temperature              |                                                                                                     | 63.90                         | 52.40                         | 42.25                         | 31.50                         |
| Daily Average Liquid Surf. Temperature         | Constant 0.0079 has units of ( $^{\circ}$ R-ft <sup>2</sup> -day/btu).                              | 65.70                         | 53.70                         | 43.04                         | 32.11                         |
| Liquid Bulk Temperature                        | If $T_B$ is unknown, see AP-42 7.1-23 Note 3. Not included here as $T_B$ is always calculated.      | 63.92                         | 52.42                         | 42.27                         | 31.52                         |
| Vapor Pressure at Daily Av. Liquid Surf. Temp. | Used for speciated emissions and most vapor pressures. $P_{VA,Tb}$ uses $T_{LA}$ .                  | 0.9230                        | 0.6261                        | 0.4371                        | 0.2979                        |
| Vapor Pressure at Daily Av. Liquid Bulk Temp.  | Used for vapor space expansion factor. $P_{VA,Tb}$ uses $T_B$ .                                     | 0.8723                        | 0.6002                        | 0.4257                        | 0.2917                        |
| Vapor Pressure Function                        | Use $T_B$ for calculating $P_{VA}$ per Eqn. 2-3 Note 3.                                             | 0.0160                        | 0.0109                        | 0.0077                        | 0.0052                        |
| Average Ambient Wind Speed                     | Monthly Average                                                                                     | 0.0                           | 0.0                           | 0.0                           | 0.0                           |
| Rim Seal Loss                                  |                                                                                                     | 1.91                          | 1.36                          | 0.94                          | 0.67                          |
| Withdrawal Loss                                | Constant 0.943 has units of (1,000 ft <sup>3</sup> gal / bbl <sup>2</sup> )                         | 2.78                          | 2.78                          | 2.78                          | 2.78                          |
| Deck Fitting Loss                              |                                                                                                     | 7.32                          | 5.21                          | 3.59                          | 2.56                          |
| Deck Seam Loss                                 |                                                                                                     | 0.00                          | 0.00                          | 0.00                          | 0.00                          |
| <b>Total Emission from Normal Operation</b>    |                                                                                                     | <b>12.01</b>                  | <b>9.35</b>                   | <b>7.31</b>                   | <b>6.01</b>                   |

**Floating Roof Tank Emissions**

Based on AP-42, November 2006, Section 7.1.3.2.

Tool Last Updated: 12/14/15 [Click Here to Go Back to Cover Page](#)

|                       |      |
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| <b>Reporting Year</b> | 2017 |
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| Tank Reference Parameters         |                                                                       |                        |                                  |                             |
|-----------------------------------|-----------------------------------------------------------------------|------------------------|----------------------------------|-----------------------------|
| Parameter Title                   | Notes                                                                 | Parameter Symbol       | Units                            | Value                       |
| Tank ID                           | Enter only Tank ID in this tab.                                       |                        |                                  | 4006S2                      |
| Tank Name                         |                                                                       | TK <sub>name</sub>     |                                  | Gasoline EFR Scenario 2     |
| Actual Location                   |                                                                       | LOC <sub>Act</sub>     |                                  | Newell, West Virginia       |
| Location for Calculation Purposes |                                                                       | LOC <sub>Calc</sub>    |                                  | Pittsburgh, Pennsylvania    |
| Tank Roof Type                    |                                                                       | TK <sub>roof</sub>     |                                  | EFR - Pontoon               |
| Normal Capacity                   |                                                                       | Cap                    | gal                              | 1,260,000                   |
| Diameter                          |                                                                       | D                      | ft                               | 67.0                        |
| Shell Height or Length            |                                                                       | H <sub>s</sub>         | ft                               | 48.0                        |
| External Shell Color              |                                                                       | SC <sub>ext</sub>      |                                  | White                       |
| External Shell Paint Condition    |                                                                       | PC <sub>Shell</sub>    |                                  | Good                        |
| Roof Color/Shade                  |                                                                       | RC                     |                                  | White                       |
| Roof Paint Condition              |                                                                       | PC <sub>Roof</sub>     |                                  | Good                        |
| Tank Shell Solar Absorbance       |                                                                       | α <sub>Shell</sub>     |                                  | 0.17                        |
| Tank Roof Paint Solar Absorbance  |                                                                       | α <sub>Roof</sub>      |                                  | 0.17                        |
| Total Tank Paint Solar Absorbance | = (α <sub>Shell</sub> + α <sub>Roof</sub> ) / 2 {Note A, Table 7.1-6} | α <sub>Tot</sub>       |                                  | 0.17                        |
| Ideal Gas Constant,               |                                                                       | R                      | psia ft <sup>3</sup> / lbmole °R | 10.731                      |
| Ambient Pressure                  |                                                                       | P <sub>A</sub>         | psia                             | 14.109                      |
| Rim-Seal System                   |                                                                       | TK <sub>RimSeal</sub>  |                                  | Mechanical-shoe/Rim-mounted |
| Tank Fittings                     |                                                                       | TK <sub>Fittings</sub> |                                  | Detail                      |

| Floating Roof Parameters                    |                                                                                                                                                                                                                                                                                  |                         |                                   |            |
|---------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------------------|------------|
| Parameter Title                             | Notes                                                                                                                                                                                                                                                                            | Parameter Symbol        | Units                             | Value      |
| Heated Tank?                                |                                                                                                                                                                                                                                                                                  | HT                      |                                   | No         |
| Liquid Bulk Temperature                     | Heated Tanks Only                                                                                                                                                                                                                                                                | T <sub>B</sub>          | Degrees F                         | --         |
| Number of fixed roof support columns        |                                                                                                                                                                                                                                                                                  | N <sub>Col</sub>        |                                   | 0          |
| Effective Column Diameter                   | 1.1 for 9" by 7" built-up column<br>0.7 for 8" diameter pipe column<br>1.0 for unknown pipe column                                                                                                                                                                               | F <sub>C</sub>          | (col perimeter/π) ft              | 1.0        |
| Internal Shell Condition                    |                                                                                                                                                                                                                                                                                  | SC <sub>int</sub>       |                                   | Light Rust |
| Tank Construction                           |                                                                                                                                                                                                                                                                                  | TK <sub>Const</sub>     |                                   | Welded     |
| Deck Type                                   |                                                                                                                                                                                                                                                                                  | TK <sub>Deck</sub>      |                                   | --         |
| Total Length of Deck Seams                  |                                                                                                                                                                                                                                                                                  | L <sub>Seam</sub>       | ft                                | --         |
| Area of deck                                | = π * D <sup>2</sup> / 4 {Eqn. 2-9}<br>= L <sub>Seam</sub> / A <sub>deck</sub> {Eqn. 2-9}                                                                                                                                                                                        | A <sub>deck</sub>       | ft <sup>2</sup>                   | 3,525.7    |
| Deck Seam Length Factor                     | = 0.20 ft/ft <sup>2</sup> (5' wide sheet)<br>= 0.17 ft/ft <sup>2</sup> (6' wide sheet)<br>= 0.14 ft/ft <sup>2</sup> (7' wide sheet)<br>= 0.33 ft/ft <sup>2</sup> (5' x 7.5' panels)<br>= 0.28 ft/ft <sup>2</sup> (5' 12' panels)<br>= 0.20 ft/ft <sup>2</sup> (most common type) | S <sub>D</sub>          | ft/ft <sup>2</sup>                | --         |
| Deck Construction (IFR w/Bolted Decks Only) | Not applicable if L <sub>Seam</sub> specified.                                                                                                                                                                                                                                   | TK <sub>DeckConst</sub> |                                   | --         |
| Zero wind speed rim seal loss factor        | AP-42 Table 7.1-8                                                                                                                                                                                                                                                                | K <sub>RA</sub>         | lb-mole/ft-yr                     | 0.6        |
| Wind speed dependent rim seal loss factor   | AP-42 Table 7.1-8                                                                                                                                                                                                                                                                | K <sub>RB</sub>         | lb-mole/(mph) <sup>3</sup> -ft-yr | 0.4        |
| Fitting Wind Speed Correction Factor        | = 0.7 {EFR Tanks Only}<br>= 0.0 {IFR and Domed EFR Tanks Only} {Eqn. 2-7}                                                                                                                                                                                                        | K <sub>V</sub>          |                                   | 0.7        |
| Seal related wind speed exponent            |                                                                                                                                                                                                                                                                                  | n                       |                                   | 1.0        |
| Days per Year                               | For leap years, days = 366                                                                                                                                                                                                                                                       | t <sub>yr</sub>         | days/yr                           | 365        |

| Emission Summary       |                            |                  |       |
|------------------------|----------------------------|------------------|-------|
| Annual Throughput, gal | 32,850,000                 | Annual Turnovers | 26.07 |
| Annual Emissions, tons | 2.12                       |                  |       |
| Month                  | Normal Operation Loss, lbs | Emissions, tpy   |       |
| Jan                    | 218.03                     | 0.109            |       |
| Feb                    | 208.11                     | 0.104            |       |
| Mar                    | 299.71                     | 0.150            |       |
| Apr                    | 362.70                     | 0.181            |       |
| May                    | 426.34                     | 0.213            |       |
| Jun                    | 473.66                     | 0.237            |       |
| Jul                    | 512.72                     | 0.256            |       |
| Aug                    | 465.41                     | 0.233            |       |
| Sep                    | 401.19                     | 0.201            |       |
| Oct                    | 340.47                     | 0.170            |       |
| Nov                    | 291.19                     | 0.146            |       |
| Dec                    | 242.09                     | 0.1210           |       |

Note: The emission summary table is pulled into the Tank Emissions tab using cell references A31:B42. The emission summary must remain at this cell reference to function properly.

| Calculations                                   |                                                                                                                  |                      |                            |                                                                                                                                                                                                                                                                                                                                                                                                                | 1                    | 2                    | 3                    | 4                    | 5                    | 6                    | 7                    | 8                    |
|------------------------------------------------|------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Parameter Title                                | Notes                                                                                                            | Parameter Symbol     | Units                      | Reference or Equation                                                                                                                                                                                                                                                                                                                                                                                          | Jan                  | Feb                  | Mar                  | Apr                  | May                  | Jun                  | Jul                  | Aug                  |
| <b>Service</b>                                 |                                                                                                                  |                      |                            |                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  |
| Type of Substance                              | Select Organic Liquid, Petroleum Distillate, or Crude Oil                                                        |                      |                            |                                                                                                                                                                                                                                                                                                                                                                                                                | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate |
| Contents of Tank                               | Select from list (add new compounds in 'VOLs' tab):                                                              |                      |                            | = User specified                                                                                                                                                                                                                                                                                                                                                                                               | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    |
| Speciation Profile                             | Select from list (add new in 'Speciation Input' tab):                                                            |                      |                            | = User specified                                                                                                                                                                                                                                                                                                                                                                                               | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    |
| Speciation Profile Type                        |                                                                                                                  |                      |                            | = User specified                                                                                                                                                                                                                                                                                                                                                                                               | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   |
| Monthly Throughput                             |                                                                                                                  | Q                    | gal/month                  | = User specified                                                                                                                                                                                                                                                                                                                                                                                               | 2,737,500            | 2,737,500            | 2,737,500            | 2,737,500            | 2,737,500            | 2,737,500            | 2,737,500            | 2,737,500            |
| Days-In-Service                                | Input "0" for OOS                                                                                                | t <sub>IS</sub>      | days                       | = User specified                                                                                                                                                                                                                                                                                                                                                                                               | 31                   | 28                   | 31                   | 30                   | 31                   | 30                   | 31                   | 31                   |
| Shell Clingage Factor                          |                                                                                                                  | C <sub>S</sub>       | bbl / 1000 ft <sup>2</sup> | {Table 7.1-10}                                                                                                                                                                                                                                                                                                                                                                                                 | 0.0015               | 0.0015               | 0.0015               | 0.0015               | 0.0015               | 0.0015               | 0.0015               | 0.0015               |
| Total Deck Fitting Loss Factor                 | Eqn. 2-6                                                                                                         | F <sub>F</sub>       | lb-mole/yr                 | $= [(N_{F1} * K_{F1}) + (N_{F2} * K_{F2}) + \dots + (N_{Fnl} * K_{Fnl})]$ {Eqn. 2-6}                                                                                                                                                                                                                                                                                                                           | 231.2                | 229.4                | 231.2                | 225.6                | 200.5                | 185.4                | 174.2                | 166.5                |
| Daily Total Solar Insolation Factor            |                                                                                                                  | I                    | Btu / ft <sup>2</sup> day  |                                                                                                                                                                                                                                                                                                                                                                                                                | 552                  | 794                  | 1,117                | 1,452                | 1,736                | 1,922                | 1,881                | 1,663                |
| Product Factor                                 | Eqn. 2-3                                                                                                         | K <sub>C</sub>       |                            | = 0.4 {crude oils}<br>= 1.0 {all other org. liquids}                                                                                                                                                                                                                                                                                                                                                           | 1.0                  | 1.0                  | 1.0                  | 1.0                  | 1.0                  | 1.0                  | 1.0                  | 1.0                  |
| Deck Seam Loss per Unit Seam Length Factor     | Converted K <sub>D</sub> into monthly emissions by scaling by the time in service for the month.                 | K <sub>D</sub>       | lb-mole / ft-month         | = 0.0 {IFR Tank with welded deck and all EFR Tanks}<br>= 0.14 * t <sub>IS</sub> / t <sub>yr</sub> {bolted deck}                                                                                                                                                                                                                                                                                                | 0.000                | 0.000                | 0.000                | 0.000                | 0.000                | 0.000                | 0.000                | 0.000                |
| Vapor Molecular Weight                         | When using full speciation profiles, calculated as the weighted average of the M of each component.              | M <sub>V</sub>       | lb/lb-mole                 | = VOL data of tank contents {partial speciation}<br>$M_V = \sum (M_{Vi} * (P_{VA,Ti} / P_{VA,Ta}))$                                                                                                                                                                                                                                                                                                            | 62.0                 | 62.0                 | 62.0                 | 62.0                 | 62.0                 | 62.0                 | 62.0                 | 62.0                 |
| Liquid Molecular Weight                        |                                                                                                                  | M <sub>L</sub>       | lb/lb-mole                 | $M_L = 1 / \sum (Z_{Li} / M_{Li})$ {full speciation, Eqn. 1-22}                                                                                                                                                                                                                                                                                                                                                | 92.0                 | 92.0                 | 92.0                 | 92.0                 | 92.0                 | 92.0                 | 92.0                 | 92.0                 |
| Liquid Density at 60 °F                        |                                                                                                                  | W <sub>L</sub>       | lb/gal                     | = VOL data of tank contents {partial speciation}<br>$= \sum (M_{Li} * Z_{Li})$ {full speciation, Eqn. 1-22}                                                                                                                                                                                                                                                                                                    | 5.60                 | 5.60                 | 5.60                 | 5.60                 | 5.60                 | 5.60                 | 5.60                 | 5.60                 |
| Average Daily Minimum Ambient Temperature      |                                                                                                                  | T <sub>AN</sub>      | °F                         |                                                                                                                                                                                                                                                                                                                                                                                                                | 18.50                | 20.30                | 29.80                | 38.80                | 48.40                | 56.90                | 61.60                | 60.20                |
| Average Daily Maximum Ambient Temperature      |                                                                                                                  | T <sub>AX</sub>      | °F                         |                                                                                                                                                                                                                                                                                                                                                                                                                | 33.70                | 36.90                | 49.00                | 60.30                | 70.60                | 78.90                | 82.60                | 80.80                |
| Daily Average Ambient Temperature              |                                                                                                                  | T <sub>AA</sub>      | °F                         | $= (T_{AX} + T_{AN}) / 2$ {Eqn. 1-27}                                                                                                                                                                                                                                                                                                                                                                          | 26.10                | 28.60                | 39.40                | 49.55                | 59.50                | 67.90                | 72.10                | 70.50                |
| Daily Average Liquid Surf. Temperature         | Constant 0.0079 has units of (°R-ft <sup>2</sup> -day/btu).                                                      | T <sub>LA</sub>      | °F                         | $= (0.44 * T_{AA}) + (0.56 * T_B) + (0.0079 * \alpha_{Tot} * I)$ {Eqn. 1-26}                                                                                                                                                                                                                                                                                                                                   | 26.85                | 29.68                | 40.91                | 51.51                | 61.84                | 70.49                | 74.64                | 72.74                |
| Liquid Bulk Temperature                        | If T <sub>B</sub> is unknown, see AP-42 7.1-23 Note 3. Not included here as T <sub>B</sub> is always calculated. | T <sub>B</sub>       | degrees F                  | = specified by user {heated tanks only}<br>$= T_{AA} + 6 * \alpha_{Tot} - 1$ {Eqn. 1-28}                                                                                                                                                                                                                                                                                                                       | 26.12                | 28.62                | 39.42                | 49.57                | 59.52                | 67.92                | 72.12                | 70.52                |
| Vapor Pressure at Daily Av. Liquid Surf. Temp. | Used for speciated emissions and most vapor pressures. P <sub>VA,Ta</sub> uses T <sub>LA</sub> .                 | P <sub>VA,Ta</sub>   | psia                       | {full speciation profiles, Eqn. 1-22}: Sum of partial true vapor pressures components.<br>{partial/no speciation profiles}: Vapor pressures at T (°F) based on P <sub>VA</sub> values in VOLs tab at ΔT (°F) increments by interpolating between the P <sub>VA</sub> values at the next highest/lowest T.<br>$P_{VA,T} = (T - T_{Low}) / (T_{High} - T_{Low}) * (P_{VA,T,High} - P_{VA,T,Low}) + P_{VA,T,Low}$ | 3.5872               | 3.8085               | 4.7996               | 5.9147               | 7.1915               | 8.4206               | 9.0657               | 8.7664               |
| Vapor Pressure at Daily Av. Liquid Bulk Temp.  | Used for vapor space expansion factor. P <sub>VA,Tb</sub> uses T <sub>B</sub> .                                  | P <sub>VA,Tb</sub>   | psia                       | {full speciation profiles, Eqn. 1-22}: Sum of partial true vapor pressures components.<br>{partial/no speciation profiles}: Vapor pressures at T (°F) based on P <sub>VA</sub> values in VOLs tab at ΔT (°F) increments by interpolating between the P <sub>VA</sub> values at the next highest/lowest T.<br>$P_{VA,T} = (T - T_{Low}) / (T_{High} - T_{Low}) * (P_{VA,T,High} - P_{VA,T,Low}) + P_{VA,T,Low}$ | 3.5316               | 3.7244               | 4.6572               | 5.6964               | 6.8870               | 8.0390               | 8.6695               | 8.4248               |
| Vapor Pressure Function                        | Use T <sub>B</sub> for calculating P <sub>VA</sub> per Eqn. 2-3 Note 3.                                          | P <sub>f</sub>       |                            | $= (P_{VA,Tb} / P_A) / (1 + (1 - P_{VA,Tb} / P_A)^{0.5})^2$ {Eqn. 2-3}                                                                                                                                                                                                                                                                                                                                         | 0.0719               | 0.0765               | 0.0998               | 0.1286               | 0.1659               | 0.2078               | 0.2339               | 0.2235               |
| Average Ambient Wind Speed                     | Monthly Average                                                                                                  | v                    | mph                        | = 0 {Domed EFR and all IFR tanks, Eqn. 2-3 Note 3}                                                                                                                                                                                                                                                                                                                                                             | 10.6                 | 10.5                 | 10.6                 | 10.3                 | 8.9                  | 8.0                  | 7.3                  | 6.8                  |
| Rim Seal Loss                                  |                                                                                                                  | L <sub>R</sub>       | lb/month                   | $= (K_{Ra} + K_{Rb} * v^3) * D * P_f * M_V * K_C * t_{IS} / t_{yr}$ {Eqn. 2-2}                                                                                                                                                                                                                                                                                                                                 | 122.78               | 116.97               | 170.45               | 207.18               | 243.46               | 269.61               | 290.45               | 261.74               |
| Withdrawal Loss                                | Constant 0.943 has units of (1,000 ft <sup>3</sup> gal / bbl <sup>2</sup> )                                      | L <sub>WD</sub>      | lb/month                   | $= 0.943 * (Q / (42 \text{ gal/bbl})) * C_S * W_L / D * (1 + (N_{Col} * F_C / D))$ {Eqn. 2-4}                                                                                                                                                                                                                                                                                                                  | 7.71                 | 7.71                 | 7.71                 | 7.71                 | 7.71                 | 7.71                 | 7.71                 | 7.71                 |
| Deck Fitting Loss                              |                                                                                                                  | L <sub>F</sub>       | lb/month                   | $= F_F * P_f * M_V * K_C * t_{IS} / t_{yr}$ {Eqn. 2-5}                                                                                                                                                                                                                                                                                                                                                         | 87.55                | 83.43                | 121.55               | 147.82               | 175.18               | 196.35               | 214.56               | 195.96               |
| Deck Seam Loss                                 |                                                                                                                  | L <sub>D</sub>       | lb/month                   | = 0 {welded IFR and all EFR tanks}<br>$= K_D * S_D * D^2 * P_f * M_V * K_C$ {Eqn. 2-9}                                                                                                                                                                                                                                                                                                                         | 0.00                 | 0.00                 | 0.00                 | 0.00                 | 0.00                 | 0.00                 | 0.00                 | 0.00                 |
| <b>Total Emission from Normal Operation</b>    |                                                                                                                  | <b>L<sub>T</sub></b> | <b>lb/month</b>            | <b>= L<sub>R</sub> + L<sub>WD</sub> + L<sub>F</sub> + L<sub>D</sub></b> {Eqn. 2-1}                                                                                                                                                                                                                                                                                                                             | <b>218.03</b>        | <b>208.11</b>        | <b>299.71</b>        | <b>362.70</b>        | <b>426.34</b>        | <b>473.66</b>        | <b>512.72</b>        | <b>465.41</b>        |

| Calculations                                   |                                                                                                      | 9                    | 10                   | 11                   | 12                   |
|------------------------------------------------|------------------------------------------------------------------------------------------------------|----------------------|----------------------|----------------------|----------------------|
| Parameter Title                                | Notes                                                                                                | Sep                  | Oct                  | Nov                  | Dec                  |
| Service                                        |                                                                                                      | Main Service         | Main Service         | Main Service         | Main Service         |
| Type of Substance                              | Select Organic Liquid, Petroleum Distillate, or Crude Oil                                            | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate |
| Contents of Tank                               | Select from list (add new compounds in 'VOLs' tab):                                                  | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    |
| Speciation Profile                             | Select from list (add new in 'Speciation Input' tab):                                                | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    |
| Speciation Profile Type                        |                                                                                                      | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   |
| Monthly Throughput                             |                                                                                                      | 2,737,500            | 2,737,500            | 2,737,500            | 2,737,500            |
| Days-In-Service                                | Input "0" for OOS                                                                                    | 30                   | 31                   | 30                   | 31                   |
| Shell Clingage Factor                          |                                                                                                      | 0.0015               | 0.0015               | 0.0015               | 0.0015               |
| Total Deck Fitting Loss Factor                 | Eqn. 2-6                                                                                             | 175.8                | 192.0                | 216.5                | 225.6                |
| Daily Total Solar Insolation Factor            |                                                                                                      | 1,333                | 959                  | 581                  | 446                  |
| Product Factor                                 | Eqn. 2-3                                                                                             | 1.0                  | 1.0                  | 1.0                  | 1.0                  |
| Deck Seam Loss per Unit Seam Length Factor     | Converted $K_D$ into monthly emissions by scaling by the time in service for the month.              | 0.000                | 0.000                | 0.000                | 0.000                |
| Vapor Molecular Weight                         | When using full speciation profiles, calculated as the weighted average of the M of each component.  | 62.0                 | 62.0                 | 62.0                 | 62.0                 |
| Liquid Molecular Weight                        |                                                                                                      | 92.0                 | 92.0                 | 92.0                 | 92.0                 |
| Liquid Density at 60 °F                        |                                                                                                      | 5.60                 | 5.60                 | 5.60                 | 5.60                 |
| Average Daily Minimum Ambient Temperature      |                                                                                                      | 53.50                | 42.30                | 34.10                | 24.40                |
| Average Daily Maximum Ambient Temperature      |                                                                                                      | 74.30                | 62.50                | 50.40                | 38.60                |
| Daily Average Ambient Temperature              |                                                                                                      | 63.90                | 52.40                | 42.25                | 31.50                |
| Daily Average Liquid Surf. Temperature         | Constant 0.0079 has units of ( $^{\circ}\text{R} \cdot \text{ft}^2 \cdot \text{day} / \text{btu}$ ). | 65.70                | 53.70                | 43.04                | 32.11                |
| Liquid Bulk Temperature                        | If $T_B$ is unknown, see AP-42 7.1-23 Note 3. Not included here as $T_B$ is always calculated.       | 63.92                | 52.42                | 42.27                | 31.52                |
| Vapor Pressure at Daily Av. Liquid Surf. Temp. | Used for speciated emissions and most vapor pressures. $P_{VA, T_{LA}}$ uses $T_{LA}$ .              | 7.7208               | 6.1687               | 5.0088               | 4.0077               |
| Vapor Pressure at Daily Av. Liquid Bulk Temp.  | Used for vapor space expansion factor. $P_{VA, T_B}$ uses $T_B$ .                                    | 7.4728               | 6.0192               | 4.9322               | 3.9585               |
| Vapor Pressure Function                        | Use $T_B$ for calculating $P_{VA}$ per Eqn. 2-3 Note 3.                                              | 0.1864               | 0.1382               | 0.1071               | 0.0821               |
| Average Ambient Wind Speed                     | Monthly Average                                                                                      | 7.4                  | 8.4                  | 9.8                  | 10.3                 |
| Rim Seal Loss                                  |                                                                                                      | 226.53               | 193.04               | 165.32               | 136.79               |
| Withdrawal Loss                                | Constant 0.943 has units of (1,000 $\text{ft}^3$ gal / $\text{bbt}^2$ )                              | 7.71                 | 7.71                 | 7.71                 | 7.71                 |
| Deck Fitting Loss                              |                                                                                                      | 166.95               | 139.72               | 118.17               | 97.59                |
| Deck Seam Loss                                 |                                                                                                      | 0.00                 | 0.00                 | 0.00                 | 0.00                 |
| <b>Total Emission from Normal Operation</b>    |                                                                                                      | <b>401.19</b>        | <b>340.47</b>        | <b>291.19</b>        | <b>242.09</b>        |

**Floating Roof Tank Emissions**

Based on AP-42, November 2006, Section 7.1.3.2.

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| <b>Reporting Year</b> | 2017 |
|-----------------------|------|

| Tank Reference Parameters         |                                                                       |                        |                                  |                              |
|-----------------------------------|-----------------------------------------------------------------------|------------------------|----------------------------------|------------------------------|
| Parameter Title                   | Notes                                                                 | Parameter Symbol       | Units                            | Value                        |
| Tank ID                           | Enter only Tank ID in this tab.                                       |                        |                                  | 4005S2                       |
| Tank Name                         |                                                                       | TK <sub>name</sub>     |                                  | Prem Gasoline EFR Scenario 2 |
| Actual Location                   |                                                                       | Loc <sub>Act</sub>     |                                  | Newell, West Virginia        |
| Location for Calculation Purposes |                                                                       | Loc <sub>Calc</sub>    |                                  | Pittsburgh, Pennsylvania     |
| Tank Roof Type                    |                                                                       | TK <sub>roof</sub>     |                                  | EFR - Pontoon                |
| Normal Capacity                   |                                                                       | Cap                    | gal                              | 1,260,000                    |
| Diameter                          |                                                                       | D                      | ft                               | 67.0                         |
| Shell Height or Length            |                                                                       | H <sub>S</sub>         | ft                               | 48.0                         |
| External Shell Color              |                                                                       | SC <sub>ext</sub>      |                                  | White                        |
| External Shell Paint Condition    |                                                                       | PC <sub>Shell</sub>    |                                  | Good                         |
| Roof Color/Shade                  |                                                                       | RC                     |                                  | White                        |
| Roof Paint Condition              |                                                                       | PC <sub>Roof</sub>     |                                  | Good                         |
| Tank Shell Solar Absorbance       |                                                                       | α <sub>Shell</sub>     |                                  | 0.17                         |
| Tank Roof Paint Solar Absorbance  |                                                                       | α <sub>Roof</sub>      |                                  | 0.17                         |
| Total Tank Paint Solar Absorbance | = (α <sub>Shell</sub> + α <sub>Roof</sub> ) / 2 {Note A, Table 7.1-6} | α <sub>Tot</sub>       |                                  | 0.17                         |
| Ideal Gas Constant,               |                                                                       | R                      | psia ft <sup>3</sup> / lbmole °R | 10.731                       |
| Ambient Pressure                  |                                                                       | P <sub>A</sub>         | psia                             | 14.109                       |
| Rim-Seal System                   |                                                                       | TK <sub>RimSeal</sub>  |                                  | Mechanical-shoe/Rim-mounted  |
| Tank Fittings                     |                                                                       | TK <sub>Fittings</sub> |                                  | Detail                       |

| Floating Roof Parameters                    |                                                                                                                                                                                                                                                                                                                                        |                         |                                     |            |
|---------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-------------------------------------|------------|
| Parameter Title                             | Notes                                                                                                                                                                                                                                                                                                                                  | Parameter Symbol        | Units                               | Value      |
| Heated Tank?                                |                                                                                                                                                                                                                                                                                                                                        | HT                      |                                     | No         |
| Liquid Bulk Temperature                     | Heated Tanks Only                                                                                                                                                                                                                                                                                                                      | T <sub>B</sub>          | Degrees F                           | --         |
| Number of fixed roof support columns        |                                                                                                                                                                                                                                                                                                                                        | N <sub>Col</sub>        |                                     | 0          |
| Effective Column Diameter                   | 1.1 for 9" by 7" built-up column<br>0.7 for 8" diameter pipe column<br>1.0 for unknown pipe column                                                                                                                                                                                                                                     | F <sub>C</sub>          | (col perimeter/π) ft                | 1.0        |
| Internal Shell Condition                    |                                                                                                                                                                                                                                                                                                                                        | SC <sub>int</sub>       |                                     | Light Rust |
| Tank Construction                           |                                                                                                                                                                                                                                                                                                                                        | TK <sub>Const</sub>     |                                     | Welded     |
| Deck Type                                   |                                                                                                                                                                                                                                                                                                                                        | TK <sub>Deck</sub>      |                                     | --         |
| Total Length of Deck Seams                  |                                                                                                                                                                                                                                                                                                                                        | L <sub>Seam</sub>       | ft                                  | --         |
| Area of deck                                | = π * D <sup>2</sup> / 4 {Eqn. 2-9}                                                                                                                                                                                                                                                                                                    | A <sub>deck</sub>       | ft <sup>2</sup>                     | 3,525.7    |
| Deck Seam Length Factor                     | = L <sub>Seam</sub> / A <sub>deck</sub> {Eqn. 2-9}<br>= 0.20 ft/ft <sup>2</sup> (5' wide sheet)<br>= 0.17 ft/ft <sup>2</sup> (6' wide sheet)<br>= 0.14 ft/ft <sup>2</sup> (7' wide sheet)<br>= 0.33 ft/ft <sup>2</sup> (5' x 7.5' panels)<br>= 0.28 ft/ft <sup>2</sup> (5' 12' panels)<br>= 0.20 ft/ft <sup>2</sup> (most common type) | S <sub>D</sub>          | ft/ft <sup>2</sup>                  | --         |
| Deck Construction (IFR w/Bolted Decks Only) | Not applicable if L <sub>Seam</sub> specified.                                                                                                                                                                                                                                                                                         | TK <sub>DeckConst</sub> |                                     | --         |
| Zero wind speed rim seal loss factor        | AP-42 Table 7.1-8                                                                                                                                                                                                                                                                                                                      | K <sub>RA</sub>         | lb-mole/ft-yr                       | 0.6        |
| Wind speed dependent rim seal loss factor   | AP-42 Table 7.1-8                                                                                                                                                                                                                                                                                                                      | K <sub>RB</sub>         | lb-mole/(mph) <sup>1.5</sup> -ft-yr | 0.4        |
| Fitting Wind Speed Correction Factor        | = 0.7 {EFR Tanks Only}<br>= 0.0 {IFR and Domed EFR Tanks Only} {Eqn. 2-7}                                                                                                                                                                                                                                                              | K <sub>V</sub>          |                                     | 0.7        |
| Seal related wind speed exponent            |                                                                                                                                                                                                                                                                                                                                        | n                       |                                     | 1.0        |
| Days per Year                               | For leap years, days = 366                                                                                                                                                                                                                                                                                                             | t <sub>yr</sub>         | days/yr                             | 365        |

| Emission Summary       |                            |                  |      |
|------------------------|----------------------------|------------------|------|
| Annual Throughput, gal | 8,130,375                  | Annual Turnovers | 6.45 |
| Annual Emissions, tons | 2.09                       |                  |      |
| Month                  | Normal Operation Loss, lbs | Emissions, tpy   |      |
| Jan                    | 212.24                     | 0.106            |      |
| Feb                    | 202.31                     | 0.101            |      |
| Mar                    | 293.91                     | 0.147            |      |
| Apr                    | 356.90                     | 0.178            |      |
| May                    | 420.54                     | 0.210            |      |
| Jun                    | 467.86                     | 0.234            |      |
| Jul                    | 506.93                     | 0.253            |      |
| Aug                    | 459.61                     | 0.230            |      |
| Sep                    | 395.39                     | 0.198            |      |
| Oct                    | 334.67                     | 0.167            |      |
| Nov                    | 285.39                     | 0.143            |      |
| Dec                    | 236.29                     | 0.1181           |      |

Note: The emission summary table is pulled into the Tank Emissions tab using cell references A31:B42. The emission summary must remain at this cell reference to function properly.



| Calculations                                   |                                                                                                                  |                      |                            |                                                                                                                                                                                                                                                                                                                                                                                                                | 1                    | 2                    | 3                    | 4                    | 5                    | 6                    | 7                    | 8                    |
|------------------------------------------------|------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Parameter Title                                | Notes                                                                                                            | Parameter Symbol     | Units                      | Reference or Equation                                                                                                                                                                                                                                                                                                                                                                                          | Jan                  | Feb                  | Mar                  | Apr                  | May                  | Jun                  | Jul                  | Aug                  |
| <b>Service</b>                                 |                                                                                                                  |                      |                            |                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  |
| Type of Substance                              | Select Organic Liquid, Petroleum Distillate, or Crude Oil                                                        |                      |                            |                                                                                                                                                                                                                                                                                                                                                                                                                | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate |
| Contents of Tank                               | Select from list (add new compounds in 'VOLs' tab):                                                              |                      |                            | = User specified                                                                                                                                                                                                                                                                                                                                                                                               | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    |
| Speciation Profile                             | Select from list (add new in 'Speciation Input' tab):                                                            |                      |                            | = User specified                                                                                                                                                                                                                                                                                                                                                                                               | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    |
| Speciation Profile Type                        |                                                                                                                  |                      |                            | = User specified                                                                                                                                                                                                                                                                                                                                                                                               | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   |
| Monthly Throughput                             |                                                                                                                  | Q                    | gal/month                  | = User specified                                                                                                                                                                                                                                                                                                                                                                                               | 677,531              | 677,531              | 677,531              | 677,531              | 677,531              | 677,531              | 677,531              | 677,531              |
| Days-In-Service                                | Input "0" for OOS                                                                                                | t <sub>IS</sub>      | days                       | = User specified                                                                                                                                                                                                                                                                                                                                                                                               | 31                   | 28                   | 31                   | 30                   | 31                   | 30                   | 31                   | 31                   |
| Shell Clingage Factor                          |                                                                                                                  | C <sub>S</sub>       | bbl / 1000 ft <sup>2</sup> | {Table 7.1-10}                                                                                                                                                                                                                                                                                                                                                                                                 | 0.0015               | 0.0015               | 0.0015               | 0.0015               | 0.0015               | 0.0015               | 0.0015               | 0.0015               |
| Total Deck Fitting Loss Factor                 | Eqn. 2-6                                                                                                         | F <sub>F</sub>       | lb-mole/yr                 | $= [(N_{F1} * K_{F1}) + (N_{F2} * K_{F2}) + \dots + (N_{Fnl} * K_{Fnl})]$ {Eqn. 2-6}                                                                                                                                                                                                                                                                                                                           | 231.2                | 229.4                | 231.2                | 225.6                | 200.5                | 185.4                | 174.2                | 166.5                |
| Daily Total Solar Insolation Factor            |                                                                                                                  | I                    | Btu / ft <sup>2</sup> day  |                                                                                                                                                                                                                                                                                                                                                                                                                | 552                  | 794                  | 1,117                | 1,452                | 1,736                | 1,922                | 1,881                | 1,663                |
| Product Factor                                 | Eqn. 2-3                                                                                                         | K <sub>C</sub>       |                            | = 0.4 {crude oils}<br>= 1.0 {all other org. liquids}                                                                                                                                                                                                                                                                                                                                                           | 1.0                  | 1.0                  | 1.0                  | 1.0                  | 1.0                  | 1.0                  | 1.0                  | 1.0                  |
| Deck Seam Loss per Unit Seam Length Factor     | Converted K <sub>D</sub> into monthly emissions by scaling by the time in service for the month.                 | K <sub>D</sub>       | lb-mole / ft-month         | = 0.0 {IFR Tank with welded deck and all EFR Tanks}<br>= 0.14 * t <sub>IS</sub> / t <sub>yr</sub> {bolted deck}                                                                                                                                                                                                                                                                                                | 0.000                | 0.000                | 0.000                | 0.000                | 0.000                | 0.000                | 0.000                | 0.000                |
| Vapor Molecular Weight                         | When using full speciation profiles, calculated as the weighted average of the M of each component.              | M <sub>V</sub>       | lb/lb-mole                 | = VOL data of tank contents {partial speciation}                                                                                                                                                                                                                                                                                                                                                               | 62.0                 | 62.0                 | 62.0                 | 62.0                 | 62.0                 | 62.0                 | 62.0                 | 62.0                 |
| Liquid Molecular Weight                        |                                                                                                                  | M <sub>L</sub>       | lb/lb-mole                 | $M_V = \sum (M_{Vi} * (P_{VA,Ti} / P_{VA,TiA}))$<br>$M_L = 1 / \sum (Z_{Li} / M_{Li})$ {full speciation, Eqn. 1-22}                                                                                                                                                                                                                                                                                            | 92.0                 | 92.0                 | 92.0                 | 92.0                 | 92.0                 | 92.0                 | 92.0                 | 92.0                 |
| Liquid Density at 60 °F                        |                                                                                                                  | W <sub>L</sub>       | lb/gal                     | = VOL data of tank contents {partial speciation}<br>= $\sum (M_{Li} * Z_{Li})$ {full speciation, Eqn. 1-22}                                                                                                                                                                                                                                                                                                    | 5.60                 | 5.60                 | 5.60                 | 5.60                 | 5.60                 | 5.60                 | 5.60                 | 5.60                 |
| Average Daily Minimum Ambient Temperature      |                                                                                                                  | T <sub>AN</sub>      | °F                         |                                                                                                                                                                                                                                                                                                                                                                                                                | 18.50                | 20.30                | 29.80                | 38.80                | 48.40                | 56.90                | 61.60                | 60.20                |
| Average Daily Maximum Ambient Temperature      |                                                                                                                  | T <sub>AX</sub>      | °F                         |                                                                                                                                                                                                                                                                                                                                                                                                                | 33.70                | 36.90                | 49.00                | 60.30                | 70.60                | 78.90                | 82.60                | 80.80                |
| Daily Average Ambient Temperature              |                                                                                                                  | T <sub>AA</sub>      | °F                         | = (T <sub>AX</sub> + T <sub>AN</sub> ) / 2 {Eqn. 1-27}                                                                                                                                                                                                                                                                                                                                                         | 26.10                | 28.60                | 39.40                | 49.55                | 59.50                | 67.90                | 72.10                | 70.50                |
| Daily Average Liquid Surf. Temperature         | Constant 0.0079 has units of (°R-ft <sup>2</sup> -day/btu).                                                      | T <sub>LA</sub>      | °F                         | = (0.44 * T <sub>AA</sub> ) + (0.56 * T <sub>B</sub> ) + (0.0079 * α <sub>Tot</sub> * I) {Eqn. 1-26}                                                                                                                                                                                                                                                                                                           | 26.85                | 29.68                | 40.91                | 51.51                | 61.84                | 70.49                | 74.64                | 72.74                |
| Liquid Bulk Temperature                        | If T <sub>B</sub> is unknown, see AP-42 7.1-23 Note 3. Not included here as T <sub>B</sub> is always calculated. | T <sub>B</sub>       | degrees F                  | = specified by user {heated tanks only}<br>= T <sub>AA</sub> + 6 * α <sub>Tot</sub> - 1 {Eqn. 1-28}                                                                                                                                                                                                                                                                                                            | 26.12                | 28.62                | 39.42                | 49.57                | 59.52                | 67.92                | 72.12                | 70.52                |
| Vapor Pressure at Daily Av. Liquid Surf. Temp. | Used for speciated emissions and most vapor pressures. P <sub>VA,TiA</sub> uses T <sub>LA</sub> .                | P <sub>VA,TiA</sub>  | psia                       | {full speciation profiles, Eqn. 1-22}: Sum of partial true vapor pressures components.<br>{partial/no speciation profiles}: Vapor pressures at T (°F) based on P <sub>VA</sub> values in VOLs tab at ΔT (°F) increments by interpolating between the P <sub>VA</sub> values at the next highest/lowest T.<br>$P_{VA,T} = (T - T_{Low}) / (T_{High} - T_{Low}) * (P_{VA,T,High} - P_{VA,T,Low}) + P_{VA,T,Low}$ | 3.5872               | 3.8085               | 4.7996               | 5.9147               | 7.1915               | 8.4206               | 9.0657               | 8.7664               |
| Vapor Pressure at Daily Av. Liquid Bulk Temp.  | Used for vapor space expansion factor. P <sub>VA,Tb</sub> uses T <sub>B</sub> .                                  | P <sub>VA,Tb</sub>   | psia                       |                                                                                                                                                                                                                                                                                                                                                                                                                | 3.5316               | 3.7244               | 4.6572               | 5.6964               | 6.8870               | 8.0390               | 8.6695               | 8.4248               |
| Vapor Pressure Function                        | Use T <sub>B</sub> for calculating P <sub>VA</sub> per Eqn. 2-3 Note 3.                                          | P <sub>f</sub>       |                            | = (P <sub>VA,Tb</sub> / P <sub>A</sub> ) / (1 + (1 - P <sub>VA,Tb</sub> / P <sub>A</sub> ) <sup>0.5</sup> ) <sup>2</sup> {Eqn. 2-3}                                                                                                                                                                                                                                                                            | 0.0719               | 0.0765               | 0.0998               | 0.1286               | 0.1659               | 0.2078               | 0.2339               | 0.2235               |
| Average Ambient Wind Speed                     | Monthly Average                                                                                                  | v                    | mph                        | = 0 {Domed EFR and all IFR tanks, Eqn. 2-3 Note 3}                                                                                                                                                                                                                                                                                                                                                             | 10.6                 | 10.5                 | 10.6                 | 10.3                 | 8.9                  | 8.0                  | 7.3                  | 6.8                  |
| Rim Seal Loss                                  |                                                                                                                  | L <sub>R</sub>       | lb/month                   | = (K <sub>Ra</sub> + K <sub>Rb</sub> * v <sup>3</sup> ) * D * P <sub>f</sub> * M <sub>V</sub> * K <sub>C</sub> * t <sub>IS</sub> / t <sub>yr</sub> {Eqn. 2-2}                                                                                                                                                                                                                                                  | 122.78               | 116.97               | 170.45               | 207.18               | 243.46               | 269.61               | 290.45               | 261.74               |
| Withdrawal Loss                                | Constant 0.943 has units of (1,000 ft <sup>3</sup> gal / bbl <sup>2</sup> )                                      | L <sub>WD</sub>      | lb/month                   | = 0.943 * (Q / (42 gal/bbl)) * C <sub>S</sub> * W <sub>L</sub> / D * (1 + (N <sub>Col</sub> * F <sub>C</sub> / D)) {Eqn. 2-4}                                                                                                                                                                                                                                                                                  | 1.91                 | 1.91                 | 1.91                 | 1.91                 | 1.91                 | 1.91                 | 1.91                 | 1.91                 |
| Deck Fitting Loss                              |                                                                                                                  | L <sub>F</sub>       | lb/month                   | = F <sub>F</sub> * P <sub>f</sub> * M <sub>V</sub> * K <sub>C</sub> * t <sub>IS</sub> / t <sub>yr</sub> {Eqn. 2-5}                                                                                                                                                                                                                                                                                             | 87.55                | 83.43                | 121.55               | 147.82               | 175.18               | 196.35               | 214.56               | 195.96               |
| Deck Seam Loss                                 |                                                                                                                  | L <sub>D</sub>       | lb/month                   | = 0 {welded IFR and all EFR tanks}<br>= K <sub>D</sub> * S <sub>D</sub> * D <sup>2</sup> * P <sub>f</sub> * M <sub>V</sub> * K <sub>C</sub> {Eqn. 2-9}                                                                                                                                                                                                                                                         | 0.00                 | 0.00                 | 0.00                 | 0.00                 | 0.00                 | 0.00                 | 0.00                 | 0.00                 |
| <b>Total Emission from Normal Operation</b>    |                                                                                                                  | <b>L<sub>T</sub></b> | <b>lb/month</b>            | <b>= L<sub>R</sub> + L<sub>WD</sub> + L<sub>F</sub> + L<sub>D</sub> {Eqn. 2-1}</b>                                                                                                                                                                                                                                                                                                                             | <b>212.24</b>        | <b>202.31</b>        | <b>293.91</b>        | <b>356.90</b>        | <b>420.54</b>        | <b>467.86</b>        | <b>506.93</b>        | <b>459.61</b>        |

| Calculations                                   |                                                                                                     | 9                    | 10                   | 11                   | 12                   |
|------------------------------------------------|-----------------------------------------------------------------------------------------------------|----------------------|----------------------|----------------------|----------------------|
| Parameter Title                                | Notes                                                                                               | Sep                  | Oct                  | Nov                  | Dec                  |
| Service                                        |                                                                                                     | Main Service         | Main Service         | Main Service         | Main Service         |
| Type of Substance                              | Select Organic Liquid, Petroleum Distillate, or Crude Oil                                           | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate |
| Contents of Tank                               | Select from list (add new compounds in 'VOLs' tab):                                                 | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    |
| Speciation Profile                             | Select from list (add new in 'Speciation Input' tab):                                               | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    |
| Speciation Profile Type                        |                                                                                                     | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   |
| Monthly Throughput                             |                                                                                                     | 677,531              | 677,531              | 677,531              | 677,531              |
| Days-In-Service                                | Input "0" for OOS                                                                                   | 30                   | 31                   | 30                   | 31                   |
| Shell Clingage Factor                          |                                                                                                     | 0.0015               | 0.0015               | 0.0015               | 0.0015               |
| Total Deck Fitting Loss Factor                 | Eqn. 2-6                                                                                            | 175.8                | 192.0                | 216.5                | 225.6                |
| Daily Total Solar Insolation Factor            |                                                                                                     | 1,333                | 959                  | 581                  | 446                  |
| Product Factor                                 | Eqn. 2-3                                                                                            | 1.0                  | 1.0                  | 1.0                  | 1.0                  |
| Deck Seam Loss per Unit Seam Length Factor     | Converted $K_D$ into monthly emissions by scaling by the time in service for the month.             | 0.000                | 0.000                | 0.000                | 0.000                |
| Vapor Molecular Weight                         | When using full speciation profiles, calculated as the weighted average of the M of each component. | 62.0                 | 62.0                 | 62.0                 | 62.0                 |
| Liquid Molecular Weight                        |                                                                                                     | 92.0                 | 92.0                 | 92.0                 | 92.0                 |
| Liquid Density at 60 °F                        |                                                                                                     | 5.60                 | 5.60                 | 5.60                 | 5.60                 |
| Average Daily Minimum Ambient Temperature      |                                                                                                     | 53.50                | 42.30                | 34.10                | 24.40                |
| Average Daily Maximum Ambient Temperature      |                                                                                                     | 74.30                | 62.50                | 50.40                | 38.60                |
| Daily Average Ambient Temperature              |                                                                                                     | 63.90                | 52.40                | 42.25                | 31.50                |
| Daily Average Liquid Surf. Temperature         | Constant 0.0079 has units of ( $^{\circ}\text{R}\cdot\text{ft}^2\cdot\text{day}/\text{btu}$ ).      | 65.70                | 53.70                | 43.04                | 32.11                |
| Liquid Bulk Temperature                        | If $T_B$ is unknown, see AP-42 7.1-23 Note 3. Not included here as $T_B$ is always calculated.      | 63.92                | 52.42                | 42.27                | 31.52                |
| Vapor Pressure at Daily Av. Liquid Surf. Temp. | Used for speciated emissions and most vapor pressures. $P_{VA,T_{LA}}$ uses $T_{LA}$ .              | 7.7208               | 6.1687               | 5.0088               | 4.0077               |
| Vapor Pressure at Daily Av. Liquid Bulk Temp.  | Used for vapor space expansion factor. $P_{VA,T_B}$ uses $T_B$ .                                    | 7.4728               | 6.0192               | 4.9322               | 3.9585               |
| Vapor Pressure Function                        | Use $T_B$ for calculating $P_{VA}$ per Eqn. 2-3 Note 3.                                             | 0.1864               | 0.1382               | 0.1071               | 0.0821               |
| Average Ambient Wind Speed                     | Monthly Average                                                                                     | 7.4                  | 8.4                  | 9.8                  | 10.3                 |
| Rim Seal Loss                                  |                                                                                                     | 226.53               | 193.04               | 165.32               | 136.79               |
| Withdrawal Loss                                | Constant 0.943 has units of ( $1,000\text{ ft}^3\text{ gal} / \text{bbf}^2$ )                       | 1.91                 | 1.91                 | 1.91                 | 1.91                 |
| Deck Fitting Loss                              |                                                                                                     | 166.95               | 139.72               | 118.17               | 97.59                |
| Deck Seam Loss                                 |                                                                                                     | 0.00                 | 0.00                 | 0.00                 | 0.00                 |
| <b>Total Emission from Normal Operation</b>    |                                                                                                     | <b>395.39</b>        | <b>334.67</b>        | <b>285.39</b>        | <b>236.29</b>        |

**Floating Roof Tank Emissions**

Based on AP-42, November 2006, Section 7.1.3.2.

Tool Last Updated: 12/14/15 [Click Here to Go Back to Cover Page](#)

|                       |      |
|-----------------------|------|
| <b>Reporting Year</b> | 2017 |
|-----------------------|------|

| Tank Reference Parameters         |                                                                       |                        |                                  |                             |
|-----------------------------------|-----------------------------------------------------------------------|------------------------|----------------------------------|-----------------------------|
| Parameter Title                   | Notes                                                                 | Parameter Symbol       | Units                            | Value                       |
| Tank ID                           | Enter only Tank ID in this tab.                                       |                        |                                  | 4004S2                      |
| Tank Name                         |                                                                       | TK <sub>name</sub>     |                                  | Gasoline EFR Scenario 2     |
| Actual Location                   |                                                                       | LOC <sub>Act</sub>     |                                  | Newell, West Virginia       |
| Location for Calculation Purposes |                                                                       | LOC <sub>Calc</sub>    |                                  | Pittsburgh, Pennsylvania    |
| Tank Roof Type                    |                                                                       | TK <sub>roof</sub>     |                                  | EFR - Pontoon               |
| Normal Capacity                   |                                                                       | Cap                    | gal                              | 1,260,000                   |
| Diameter                          |                                                                       | D                      | ft                               | 67.0                        |
| Shell Height or Length            |                                                                       | H <sub>s</sub>         | ft                               | 48.0                        |
| External Shell Color              |                                                                       | SC <sub>ext</sub>      |                                  | White                       |
| External Shell Paint Condition    |                                                                       | PC <sub>Shell</sub>    |                                  | Good                        |
| Roof Color/Shade                  |                                                                       | RC                     |                                  | White                       |
| Roof Paint Condition              |                                                                       | PC <sub>Roof</sub>     |                                  | Good                        |
| Tank Shell Solar Absorbance       |                                                                       | α <sub>Shell</sub>     |                                  | 0.17                        |
| Tank Roof Paint Solar Absorbance  |                                                                       | α <sub>Roof</sub>      |                                  | 0.17                        |
| Total Tank Paint Solar Absorbance | = (α <sub>Shell</sub> + α <sub>Roof</sub> ) / 2 {Note A, Table 7.1-6} | α <sub>Tot</sub>       |                                  | 0.17                        |
| Ideal Gas Constant,               |                                                                       | R                      | psia ft <sup>3</sup> / lbmole °R | 10.731                      |
| Ambient Pressure                  |                                                                       | P <sub>A</sub>         | psia                             | 14.109                      |
| Rim-Seal System                   |                                                                       | TK <sub>RimSeal</sub>  |                                  | Mechanical-shoe/Rim-mounted |
| Tank Fittings                     |                                                                       | TK <sub>Fittings</sub> |                                  | Detail                      |

| Floating Roof Parameters                    |                                                                                                                                                                                                                                                                                                                                        |                         |                                   |            |
|---------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------------------|------------|
| Parameter Title                             | Notes                                                                                                                                                                                                                                                                                                                                  | Parameter Symbol        | Units                             | Value      |
| Heated Tank?                                |                                                                                                                                                                                                                                                                                                                                        | HT                      |                                   | No         |
| Liquid Bulk Temperature                     | Heated Tanks Only                                                                                                                                                                                                                                                                                                                      | T <sub>B</sub>          | Degrees F                         | --         |
| Number of fixed roof support columns        |                                                                                                                                                                                                                                                                                                                                        | N <sub>Col</sub>        |                                   | 0          |
| Effective Column Diameter                   | 1.1 for 9" by 7" built-up column<br>0.7 for 8" diameter pipe column<br>1.0 for unknown pipe column                                                                                                                                                                                                                                     | F <sub>C</sub>          | (col perimeter/π) ft              | 1.0        |
| Internal Shell Condition                    |                                                                                                                                                                                                                                                                                                                                        | SC <sub>int</sub>       |                                   | Light Rust |
| Tank Construction                           |                                                                                                                                                                                                                                                                                                                                        | TK <sub>Const</sub>     |                                   | Welded     |
| Deck Type                                   |                                                                                                                                                                                                                                                                                                                                        | TK <sub>Deck</sub>      |                                   | --         |
| Total Length of Deck Seams                  |                                                                                                                                                                                                                                                                                                                                        | L <sub>Seam</sub>       | ft                                | --         |
| Area of deck                                | = π * D <sup>2</sup> / 4 {Eqn. 2-9}                                                                                                                                                                                                                                                                                                    | A <sub>deck</sub>       | ft <sup>2</sup>                   | 3,525.7    |
| Deck Seam Length Factor                     | = L <sub>Seam</sub> / A <sub>deck</sub> {Eqn. 2-9}<br>= 0.20 ft/ft <sup>2</sup> (5' wide sheet)<br>= 0.17 ft/ft <sup>2</sup> (6' wide sheet)<br>= 0.14 ft/ft <sup>2</sup> (7' wide sheet)<br>= 0.33 ft/ft <sup>2</sup> (5' x 7.5' panels)<br>= 0.28 ft/ft <sup>2</sup> (5' 12' panels)<br>= 0.20 ft/ft <sup>2</sup> (most common type) | S <sub>D</sub>          | ft/ft <sup>2</sup>                | --         |
| Deck Construction (IFR w/Bolted Decks Only) | Not applicable if L <sub>Seam</sub> specified.                                                                                                                                                                                                                                                                                         | TK <sub>DeckConst</sub> |                                   | --         |
| Zero wind speed rim seal loss factor        | AP-42 Table 7.1-8                                                                                                                                                                                                                                                                                                                      | K <sub>RA</sub>         | lb-mole/ft-yr                     | 0.6        |
| Wind speed dependent rim seal loss factor   | AP-42 Table 7.1-8                                                                                                                                                                                                                                                                                                                      | K <sub>RB</sub>         | lb-mole/(mph) <sup>3</sup> -ft-yr | 0.4        |
| Fitting Wind Speed Correction Factor        | = 0.7 {EFR Tanks Only}<br>= 0.0 {IFR and Domed EFR Tanks Only} {Eqn. 2-7}                                                                                                                                                                                                                                                              | K <sub>V</sub>          |                                   | 0.7        |
| Seal related wind speed exponent            |                                                                                                                                                                                                                                                                                                                                        | n                       |                                   | 1.0        |
| Days per Year                               | For leap years, days = 366                                                                                                                                                                                                                                                                                                             | t <sub>yr</sub>         | days/yr                           | 365        |

| Emission Summary       |                            |                                                                                                                                                                                     |       |
|------------------------|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Annual Throughput, gal | 32,850,000                 | Annual Turnovers                                                                                                                                                                    | 26.07 |
| Annual Emissions, tons | 2.12                       | Note: The emission summary table is pulled into the Tank Emissions tab using cell references A31:B42. The emission summary must remain at this cell reference to function properly. |       |
| Month                  | Normal Operation Loss, lbs | Emissions, tpy                                                                                                                                                                      |       |
| Jan                    | 218.03                     | 0.109                                                                                                                                                                               |       |
| Feb                    | 208.11                     | 0.104                                                                                                                                                                               |       |
| Mar                    | 299.71                     | 0.150                                                                                                                                                                               |       |
| Apr                    | 362.70                     | 0.181                                                                                                                                                                               |       |
| May                    | 426.34                     | 0.213                                                                                                                                                                               |       |
| Jun                    | 473.66                     | 0.237                                                                                                                                                                               |       |
| Jul                    | 512.72                     | 0.256                                                                                                                                                                               |       |
| Aug                    | 465.41                     | 0.233                                                                                                                                                                               |       |
| Sep                    | 401.19                     | 0.201                                                                                                                                                                               |       |
| Oct                    | 340.47                     | 0.170                                                                                                                                                                               |       |
| Nov                    | 291.19                     | 0.146                                                                                                                                                                               |       |
| Dec                    | 242.09                     | 0.1210                                                                                                                                                                              |       |

| Calculations                                   |                                                                                                                  |                      |                            |                                                                                                                                                                                                                                                                                                                                                                                                                | 1                    | 2                    | 3                    | 4                    | 5                    | 6                    | 7                    | 8                    |
|------------------------------------------------|------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Parameter Title                                | Notes                                                                                                            | Parameter Symbol     | Units                      | Reference or Equation                                                                                                                                                                                                                                                                                                                                                                                          | Jan                  | Feb                  | Mar                  | Apr                  | May                  | Jun                  | Jul                  | Aug                  |
| <b>Service</b>                                 |                                                                                                                  |                      |                            |                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  | <b>Main Service</b>  |
| Type of Substance                              | Select Organic Liquid, Petroleum Distillate, or Crude Oil                                                        |                      |                            |                                                                                                                                                                                                                                                                                                                                                                                                                | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate |
| Contents of Tank                               | Select from list (add new compounds in 'VOLs' tab):                                                              |                      |                            | = User specified                                                                                                                                                                                                                                                                                                                                                                                               | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    |
| Speciation Profile                             | Select from list (add new in 'Speciation Input' tab):                                                            |                      |                            | = User specified                                                                                                                                                                                                                                                                                                                                                                                               | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    |
| Speciation Profile Type                        |                                                                                                                  |                      |                            | = User specified                                                                                                                                                                                                                                                                                                                                                                                               | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   |
| Monthly Throughput                             |                                                                                                                  | Q                    | gal/month                  | = User specified                                                                                                                                                                                                                                                                                                                                                                                               | 2,737,500            | 2,737,500            | 2,737,500            | 2,737,500            | 2,737,500            | 2,737,500            | 2,737,500            | 2,737,500            |
| Days-In-Service                                | Input "0" for OOS                                                                                                | t <sub>IS</sub>      | days                       | = User specified                                                                                                                                                                                                                                                                                                                                                                                               | 31                   | 28                   | 31                   | 30                   | 31                   | 30                   | 31                   | 31                   |
| Shell Clingage Factor                          |                                                                                                                  | C <sub>S</sub>       | bbl / 1000 ft <sup>2</sup> | {Table 7.1-10}                                                                                                                                                                                                                                                                                                                                                                                                 | 0.0015               | 0.0015               | 0.0015               | 0.0015               | 0.0015               | 0.0015               | 0.0015               | 0.0015               |
| Total Deck Fitting Loss Factor                 | Eqn. 2-6                                                                                                         | F <sub>F</sub>       | lb-mole/yr                 | $= [(N_{F1} * K_{F1}) + (N_{F2} * K_{F2}) + \dots + (N_{Fnl} * K_{Fnl})]$ {Eqn. 2-6}                                                                                                                                                                                                                                                                                                                           | 231.2                | 229.4                | 231.2                | 225.6                | 200.5                | 185.4                | 174.2                | 166.5                |
| Daily Total Solar Insolation Factor            |                                                                                                                  | I                    | Btu / ft <sup>2</sup> day  |                                                                                                                                                                                                                                                                                                                                                                                                                | 552                  | 794                  | 1,117                | 1,452                | 1,736                | 1,922                | 1,881                | 1,663                |
| Product Factor                                 | Eqn. 2-3                                                                                                         | K <sub>C</sub>       |                            | = 0.4 {crude oils}<br>= 1.0 {all other org. liquids}                                                                                                                                                                                                                                                                                                                                                           | 1.0                  | 1.0                  | 1.0                  | 1.0                  | 1.0                  | 1.0                  | 1.0                  | 1.0                  |
| Deck Seam Loss per Unit Seam Length Factor     | Converted K <sub>D</sub> into monthly emissions by scaling by the time in service for the month.                 | K <sub>D</sub>       | lb-mole / ft-month         | = 0.0 {IFR Tank with welded deck and all EFR Tanks}<br>= 0.14 * t <sub>IS</sub> / t <sub>yr</sub> {bolted deck}                                                                                                                                                                                                                                                                                                | 0.000                | 0.000                | 0.000                | 0.000                | 0.000                | 0.000                | 0.000                | 0.000                |
| Vapor Molecular Weight                         | When using full speciation profiles, calculated as the weighted average of the M of each component.              | M <sub>V</sub>       | lb/lb-mole                 | = VOL data of tank contents {partial speciation}<br>$M_V = \sum (M_{Vi} * (P_{VA,Ti} / P_{VA,Ta}))$                                                                                                                                                                                                                                                                                                            | 62.0                 | 62.0                 | 62.0                 | 62.0                 | 62.0                 | 62.0                 | 62.0                 | 62.0                 |
| Liquid Molecular Weight                        |                                                                                                                  | M <sub>L</sub>       | lb/lb-mole                 | $M_L = 1 / \sum (Z_{Li} / M_{Li})$ {full speciation, Eqn. 1-22}                                                                                                                                                                                                                                                                                                                                                | 92.0                 | 92.0                 | 92.0                 | 92.0                 | 92.0                 | 92.0                 | 92.0                 | 92.0                 |
| Liquid Density at 60 °F                        |                                                                                                                  | W <sub>L</sub>       | lb/gal                     | = VOL data of tank contents {partial speciation}<br>$= \sum (M_{Li} * Z_{Li})$ {full speciation, Eqn. 1-22}                                                                                                                                                                                                                                                                                                    | 5.60                 | 5.60                 | 5.60                 | 5.60                 | 5.60                 | 5.60                 | 5.60                 | 5.60                 |
| Average Daily Minimum Ambient Temperature      |                                                                                                                  | T <sub>AN</sub>      | °F                         |                                                                                                                                                                                                                                                                                                                                                                                                                | 18.50                | 20.30                | 29.80                | 38.80                | 48.40                | 56.90                | 61.60                | 60.20                |
| Average Daily Maximum Ambient Temperature      |                                                                                                                  | T <sub>AX</sub>      | °F                         |                                                                                                                                                                                                                                                                                                                                                                                                                | 33.70                | 36.90                | 49.00                | 60.30                | 70.60                | 78.90                | 82.60                | 80.80                |
| Daily Average Ambient Temperature              |                                                                                                                  | T <sub>AA</sub>      | °F                         | $= (T_{AX} + T_{AN}) / 2$ {Eqn. 1-27}                                                                                                                                                                                                                                                                                                                                                                          | 26.10                | 28.60                | 39.40                | 49.55                | 59.50                | 67.90                | 72.10                | 70.50                |
| Daily Average Liquid Surf. Temperature         | Constant 0.0079 has units of (°R-ft <sup>2</sup> -day/btu).                                                      | T <sub>LA</sub>      | °F                         | $= (0.44 * T_{AA}) + (0.56 * T_B) + (0.0079 * \alpha_{Tot} * I)$ {Eqn. 1-26}                                                                                                                                                                                                                                                                                                                                   | 26.85                | 29.68                | 40.91                | 51.51                | 61.84                | 70.49                | 74.64                | 72.74                |
| Liquid Bulk Temperature                        | If T <sub>B</sub> is unknown, see AP-42 7.1-23 Note 3. Not included here as T <sub>B</sub> is always calculated. | T <sub>B</sub>       | degrees F                  | = specified by user {heated tanks only}<br>$= T_{AA} + 6 * \alpha_{Tot} - 1$ {Eqn. 1-28}                                                                                                                                                                                                                                                                                                                       | 26.12                | 28.62                | 39.42                | 49.57                | 59.52                | 67.92                | 72.12                | 70.52                |
| Vapor Pressure at Daily Av. Liquid Surf. Temp. | Used for speciated emissions and most vapor pressures. P <sub>VA,Ta</sub> uses T <sub>LA</sub> .                 | P <sub>VA,Ta</sub>   | psia                       | {full speciation profiles, Eqn. 1-22}: Sum of partial true vapor pressures components.<br>{partial/no speciation profiles}: Vapor pressures at T (°F) based on P <sub>VA</sub> values in VOLs tab at ΔT (°F) increments by interpolating between the P <sub>VA</sub> values at the next highest/lowest T.<br>$P_{VA,T} = (T - T_{Low}) / (T_{High} - T_{Low}) * (P_{VA,T,High} - P_{VA,T,Low}) + P_{VA,T,Low}$ | 3.5872               | 3.8085               | 4.7996               | 5.9147               | 7.1915               | 8.4206               | 9.0657               | 8.7664               |
| Vapor Pressure at Daily Av. Liquid Bulk Temp.  | Used for vapor space expansion factor. P <sub>VA,Tb</sub> uses T <sub>B</sub> .                                  | P <sub>VA,Tb</sub>   | psia                       | {full speciation profiles, Eqn. 1-22}: Sum of partial true vapor pressures components.<br>{partial/no speciation profiles}: Vapor pressures at T (°F) based on P <sub>VA</sub> values in VOLs tab at ΔT (°F) increments by interpolating between the P <sub>VA</sub> values at the next highest/lowest T.<br>$P_{VA,T} = (T - T_{Low}) / (T_{High} - T_{Low}) * (P_{VA,T,High} - P_{VA,T,Low}) + P_{VA,T,Low}$ | 3.5316               | 3.7244               | 4.6572               | 5.6964               | 6.8870               | 8.0390               | 8.6695               | 8.4248               |
| Vapor Pressure Function                        | Use T <sub>B</sub> for calculating P <sub>VA</sub> per Eqn. 2-3 Note 3.                                          | P <sub>f</sub>       |                            | $= (P_{VA,Tb} / P_A) / (1 + (1 - P_{VA,Tb} / P_A)^{0.5})^2$ {Eqn. 2-3}                                                                                                                                                                                                                                                                                                                                         | 0.0719               | 0.0765               | 0.0998               | 0.1286               | 0.1659               | 0.2078               | 0.2339               | 0.2235               |
| Average Ambient Wind Speed                     | Monthly Average                                                                                                  | v                    | mph                        | = 0 {Domed EFR and all IFR tanks, Eqn. 2-3 Note 3}                                                                                                                                                                                                                                                                                                                                                             | 10.6                 | 10.5                 | 10.6                 | 10.3                 | 8.9                  | 8.0                  | 7.3                  | 6.8                  |
| Rim Seal Loss                                  |                                                                                                                  | L <sub>R</sub>       | lb/month                   | $= (K_{Ra} + K_{Rb} * v^3) * D * P_f * M_V * K_C * t_{IS} / t_{yr}$ {Eqn. 2-2}                                                                                                                                                                                                                                                                                                                                 | 122.78               | 116.97               | 170.45               | 207.18               | 243.46               | 269.61               | 290.45               | 261.74               |
| Withdrawal Loss                                | Constant 0.943 has units of (1,000 ft <sup>3</sup> gal / bbl <sup>2</sup> )                                      | L <sub>WD</sub>      | lb/month                   | $= 0.943 * (Q / (42 \text{ gal/bbl})) * C_S * W_L / D * (1 + (N_{Col} * F_C / D))$ {Eqn. 2-4}                                                                                                                                                                                                                                                                                                                  | 7.71                 | 7.71                 | 7.71                 | 7.71                 | 7.71                 | 7.71                 | 7.71                 | 7.71                 |
| Deck Fitting Loss                              |                                                                                                                  | L <sub>F</sub>       | lb/month                   | $= F_F * P_f * M_V * K_C * t_{IS} / t_{yr}$ {Eqn. 2-5}                                                                                                                                                                                                                                                                                                                                                         | 87.55                | 83.43                | 121.55               | 147.82               | 175.18               | 196.35               | 214.56               | 195.96               |
| Deck Seam Loss                                 |                                                                                                                  | L <sub>D</sub>       | lb/month                   | = 0 {welded IFR and all EFR tanks}<br>$= K_D * S_D * D^2 * P_f * M_V * K_C$ {Eqn. 2-9}                                                                                                                                                                                                                                                                                                                         | 0.00                 | 0.00                 | 0.00                 | 0.00                 | 0.00                 | 0.00                 | 0.00                 | 0.00                 |
| <b>Total Emission from Normal Operation</b>    |                                                                                                                  | <b>L<sub>T</sub></b> | <b>lb/month</b>            | <b>= L<sub>R</sub> + L<sub>WD</sub> + L<sub>F</sub> + L<sub>D</sub></b> {Eqn. 2-1}                                                                                                                                                                                                                                                                                                                             | <b>218.03</b>        | <b>208.11</b>        | <b>299.71</b>        | <b>362.70</b>        | <b>426.34</b>        | <b>473.66</b>        | <b>512.72</b>        | <b>465.41</b>        |

| Calculations                                   |                                                                                                     | 9                    | 10                   | 11                   | 12                   |
|------------------------------------------------|-----------------------------------------------------------------------------------------------------|----------------------|----------------------|----------------------|----------------------|
| Parameter Title                                | Notes                                                                                               | Sep                  | Oct                  | Nov                  | Dec                  |
| Service                                        |                                                                                                     | Main Service         | Main Service         | Main Service         | Main Service         |
| Type of Substance                              | Select Organic Liquid, Petroleum Distillate, or Crude Oil                                           | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate | Petroleum Distillate |
| Contents of Tank                               | Select from list (add new compounds in 'VOLs' tab):                                                 | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    | Gasoline (RVP 13)    |
| Speciation Profile                             | Select from list (add new in 'Speciation Input' tab):                                               | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    | Gasoline - Normal    |
| Speciation Profile Type                        |                                                                                                     | Partial Speciation   | Partial Speciation   | Partial Speciation   | Partial Speciation   |
| Monthly Throughput                             |                                                                                                     | 2,737,500            | 2,737,500            | 2,737,500            | 2,737,500            |
| Days-In-Service                                | Input "0" for OOS                                                                                   | 30                   | 31                   | 30                   | 31                   |
| Shell Clingage Factor                          |                                                                                                     | 0.0015               | 0.0015               | 0.0015               | 0.0015               |
| Total Deck Fitting Loss Factor                 | Eqn. 2-6                                                                                            | 175.8                | 192.0                | 216.5                | 225.6                |
| Daily Total Solar Insolation Factor            |                                                                                                     | 1,333                | 959                  | 581                  | 446                  |
| Product Factor                                 | Eqn. 2-3                                                                                            | 1.0                  | 1.0                  | 1.0                  | 1.0                  |
| Deck Seam Loss per Unit Seam Length Factor     | Converted $K_D$ into monthly emissions by scaling by the time in service for the month.             | 0.000                | 0.000                | 0.000                | 0.000                |
| Vapor Molecular Weight                         | When using full speciation profiles, calculated as the weighted average of the M of each component. | 62.0                 | 62.0                 | 62.0                 | 62.0                 |
| Liquid Molecular Weight                        |                                                                                                     | 92.0                 | 92.0                 | 92.0                 | 92.0                 |
| Liquid Density at 60 °F                        |                                                                                                     | 5.60                 | 5.60                 | 5.60                 | 5.60                 |
| Average Daily Minimum Ambient Temperature      |                                                                                                     | 53.50                | 42.30                | 34.10                | 24.40                |
| Average Daily Maximum Ambient Temperature      |                                                                                                     | 74.30                | 62.50                | 50.40                | 38.60                |
| Daily Average Ambient Temperature              |                                                                                                     | 63.90                | 52.40                | 42.25                | 31.50                |
| Daily Average Liquid Surf. Temperature         | Constant 0.0079 has units of ( $^{\circ}\text{R}\cdot\text{ft}^2\cdot\text{day}/\text{btu}$ ).      | 65.70                | 53.70                | 43.04                | 32.11                |
| Liquid Bulk Temperature                        | If $T_B$ is unknown, see AP-42 7.1-23 Note 3. Not included here as $T_B$ is always calculated.      | 63.92                | 52.42                | 42.27                | 31.52                |
| Vapor Pressure at Daily Av. Liquid Surf. Temp. | Used for speciated emissions and most vapor pressures. $P_{VA,T_{LA}}$ uses $T_{LA}$ .              | 7.7208               | 6.1687               | 5.0088               | 4.0077               |
| Vapor Pressure at Daily Av. Liquid Bulk Temp.  | Used for vapor space expansion factor. $P_{VA,T_B}$ uses $T_B$ .                                    | 7.4728               | 6.0192               | 4.9322               | 3.9585               |
| Vapor Pressure Function                        | Use $T_B$ for calculating $P_{VA}$ per Eqn. 2-3 Note 3.                                             | 0.1864               | 0.1382               | 0.1071               | 0.0821               |
| Average Ambient Wind Speed                     | Monthly Average                                                                                     | 7.4                  | 8.4                  | 9.8                  | 10.3                 |
| Rim Seal Loss                                  |                                                                                                     | 226.53               | 193.04               | 165.32               | 136.79               |
| Withdrawal Loss                                | Constant 0.943 has units of (1,000 $\text{ft}^3$ gal / $\text{bbf}^2$ )                             | 7.71                 | 7.71                 | 7.71                 | 7.71                 |
| Deck Fitting Loss                              |                                                                                                     | 166.95               | 139.72               | 118.17               | 97.59                |
| Deck Seam Loss                                 |                                                                                                     | 0.00                 | 0.00                 | 0.00                 | 0.00                 |
| <b>Total Emission from Normal Operation</b>    |                                                                                                     | <b>401.19</b>        | <b>340.47</b>        | <b>291.19</b>        | <b>242.09</b>        |

## ATTACHMENT O - MONITORING RECORDKEEPING REPORTING

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### Attachment O - Monitoring, Recordkeeping, Reporting, and Testing

| Source                                                                   | Monitoring                                                                               | Recordkeeping                                                                                                                                                                                                                                            | Reporting                                                                               | Testing |
|--------------------------------------------------------------------------|------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|---------|
| External Floating Roof Tanks<br>TK-4004<br>TK-4005<br>TK-4006<br>TK-4071 | The permittee will comply with the applicable inspection requirements of 40 CFR 60.113b. | The permittee will keep monthly records of throughput.<br><br>The permittee will estimate monthly and annual emissions for criteria pollutants.<br><br>The permittee will comply with the applicable recordkeeping requirements of 40 CFR 60 Subpart Kb. | The permittee will comply with the applicable reporting requirements of 40 CFR 60.115b. | NA      |
| Internal Floating Roof Tanks<br>TK-4070                                  | The permittee will comply with the applicable inspection requirements of 40 CFR 60.113b. | The permittee will keep monthly records of throughput.<br><br>The permittee will estimate monthly and annual emissions for criteria pollutants.<br><br>The permittee will comply with the applicable recordkeeping requirements of 40 CFR 60 Subpart Kb. | The permittee will comply with the applicable reporting requirements of 40 CFR 60.115b. | NA      |
| Fixed Roof Tank<br>TK-4072                                               | NA                                                                                       | The permittee will keep monthly records of throughput.<br><br>The permittee will estimate monthly and annual emissions for criteria pollutants.                                                                                                          | NA                                                                                      | NA      |

## ATTACHMENT P - PUBLIC NOTICE

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## AIR QUALITY PERMIT NOTICE Notice of Application

Notice is given that Ergon-West Virginia Inc. (EWVI) has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Construction and Modification Permit for a petroleum refinery located on 9995 Ohio River Blvd. in Newell, Hancock County, West Virginia. The latitude and longitude coordinates are: 40.60613, -80.63357.

The applicant estimates the increased potential to discharge for the following Regulated Air Pollutants will be:

| Pollutant              | Emissions in tpy<br>(tons per year) |
|------------------------|-------------------------------------|
| CO                     | 0.43                                |
| NOX                    | 0.09                                |
| PM                     | 0.01                                |
| PM10                   | 0.01                                |
| PM2.5                  | 0.01                                |
| SO <sub>2</sub>        | 1.23                                |
| VOC                    | 7.76                                |
| Total HAP              | 0.79                                |
| Benzene                | 0.09                                |
| Toluene                | 0.67                                |
| Ethylbenzene           | 0.13                                |
| Xylene                 | 0.67                                |
| Hexane                 | 0.10                                |
| 2,2,4-Trimethylpentane | 0.21                                |

Startup of operation is planned to begin on or about the day of **DATE**. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57<sup>th</sup> Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1250, during normal business hours.

Dated this **the (Day) day of (Month), (Year)**.

By: Ergon-West Virginia Inc. (EWVI)  
Neil Stanton  
Vice-President, Refining  
9995 Ohio River Blvd.  
Newell, West Virginia 26050

## ATTACHMENT S - TITLE V REVISION INFORMATION FORM

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**Attachment S**  
**Title V Permit Revision Information**

| <b>1. New Applicable Requirements Summary</b>                                                                                                                                                                                                                                                                           |                                                                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|
| Mark all applicable requirements associated with the changes involved with this permit revision:                                                                                                                                                                                                                        |                                                                                   |
| <input type="checkbox"/> SIP                                                                                                                                                                                                                                                                                            | <input type="checkbox"/> FIP                                                      |
| <input checked="" type="checkbox"/> Minor source NSR (45CSR13)                                                                                                                                                                                                                                                          | <input type="checkbox"/> PSD (45CSR14)                                            |
| <input type="checkbox"/> NESHAP (45CSR15)                                                                                                                                                                                                                                                                               | <input type="checkbox"/> Nonattainment NSR (45CSR19)                              |
| <input checked="" type="checkbox"/> Section 111 NSPS<br>(Subpart <u>40 CFR 60 Subpart Kb</u> )                                                                                                                                                                                                                          | <input type="checkbox"/> Section 112(d) MACT standards<br>(Subpart(s) _____)      |
| <input type="checkbox"/> Section 112(g) Case-by-case MACT                                                                                                                                                                                                                                                               | <input type="checkbox"/> 112(r) RMP                                               |
| <input type="checkbox"/> Section 112(i) Early reduction of HAP                                                                                                                                                                                                                                                          | <input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)         |
| <input type="checkbox"/> Section 129 Standards/Reqs.                                                                                                                                                                                                                                                                    | <input type="checkbox"/> Stratospheric ozone (Title VI)                           |
| <input type="checkbox"/> Tank vessel reqt., section 183(f)                                                                                                                                                                                                                                                              | <input type="checkbox"/> Emissions cap 45CSR§30-2.6.1                             |
| <input type="checkbox"/> NAAQS, increments or visibility (temp. sources)                                                                                                                                                                                                                                                | <input type="checkbox"/> 45CSR27 State enforceable only rule                      |
| <input type="checkbox"/> 45CSR4 State enforceable only rule                                                                                                                                                                                                                                                             | <input type="checkbox"/> Acid Rain (Title IV, 45CSR33)                            |
| <input type="checkbox"/> Emissions Trading and Banking (45CSR28)                                                                                                                                                                                                                                                        | <input type="checkbox"/> Compliance Assurance Monitoring (40CFR64) <sup>(1)</sup> |
| <input type="checkbox"/> NO <sub>x</sub> Budget Trading Program Non-EGUs (45CSR1)                                                                                                                                                                                                                                       | <input type="checkbox"/> NO <sub>x</sub> Budget Trading Program EGUs (45CSR26)    |
| <p><sup>(1)</sup> If this box is checked, please include <b>Compliance Assurance Monitoring (CAM) Form(s)</b> for each Pollutants Specific Emission Unit (PSEU) (See Attachment H to Title V Application). If this box is not checked, please explain why <b>Compliance Assurance Monitoring</b> is not applicable:</p> |                                                                                   |

| <b>2. Non Applicability Determinations</b>                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.</p> <p>40 CFR 63 Subpart CC and 40 CFR 63 Subpart UUU. These NESHAP standards apply to major HAP source facilities. The Newell Refinery is an area HAP source; as such, these NESHAP standards do not apply.</p> |
| <p><input checked="" type="checkbox"/> <b>Permit Shield Requested</b> <i>(not applicable to Minor Modifications)</i></p>                                                                                                                                                                                                                                                                                                                              |

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

### 3. Suggested Title V Draft Permit Language

Are there any changes involved with this Title V Permit revision outside of the scope of the NSR Permit revision?  Yes  No If Yes, describe the changes below.

Also, please provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e.g. 45CSR§7-4.1)) for those requirements being added / revised.

**It will be necessary to add the following emissions units: TK-4070 (gasoline tank), TK-4071 (ethanol tank), and TK-4072 (feedstock tank). It will be necessary to update the permit conditions for modified tanks TK-4004, TK-4005, and TK-4006. See attached suggested permit language.**

### 4. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision

| Permit or Consent Order Number | Date of Issuance | Permit/Consent Order Condition Number |
|--------------------------------|------------------|---------------------------------------|
| R13-2334AA                     | 06/05/2017       |                                       |
|                                | / /              |                                       |
|                                | / /              |                                       |

### 5. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision

| Permit or Consent Order Number | Date of Issuance | Permit/Consent Order Condition Number |
|--------------------------------|------------------|---------------------------------------|
|                                | / /              |                                       |
|                                | / /              |                                       |
|                                | / /              |                                       |

### 6. Change in Potential Emissions

| Pollutant     | Change in Potential Emissions (+ or -), TPY |
|---------------|---------------------------------------------|
| CO            | 0.43                                        |
| NOx           | 0.09                                        |
| PM/PM10/PM2.5 | 0.01                                        |
| SO2           | 1.23                                        |
| VOC           | 7.76                                        |
| Total HAPs    | 0.79                                        |

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

**7. Certification For Use Of Minor Modification Procedures (Required Only for Minor Modification Requests)**

*Note: This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete. The criteria for allowing the use of Minor Modification Procedures are as follows:*

- i. Proposed changes do not violate any applicable requirement;
- ii. Proposed changes do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- iii. Proposed changes 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 air quality impacts, or a visibility increment analysis;
- iv. Proposed changes do not seek to establish or change a permit term or condition for which there is no underlying applicable requirement and which permit or condition has been used to avoid an applicable requirement to which the source would otherwise be subject (synthetic minor). Such terms and conditions include, but are not limited to a federally enforceable emissions cap used to avoid classification as a modification under any provision of Title I or any alternative emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Clean Air Act;
- v. Proposed changes do not involve preconstruction review under Title I of the Clean Air Act or 45CSR14 and 45CSR19;
- vi. Proposed changes are not required under any rule of the Director to be processed as a significant modification;

Notwithstanding subparagraph 45CSR§30-6.5.a.1.A. (items i through vi above), minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part of the State Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title V operating permit issued under 45CSR30.

**Pursuant to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for use of Minor permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Minor permit modification procedures are hereby requested for processing of this application.**

(Signed): Neil Stanton Date: 4 / 30 / 18  
*(Please use blue ink)* *(Please use blue ink)*  
 Named (typed): Neil Stanton Title: Vice President - Refining

**Note: Please check if the following included (if applicable):**

- Compliance Assurance Monitoring Form(s)
- Suggested Title V Draft Permit Language

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*

## ATTACHMENT T - APPLICATION FEE

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ATTACHMENT U - SUGGESTED TITLE V LANGUAGE

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## ATTACHMENT U - TITLE V PERMIT SUGGESTED LANGUAGE

Suggested language is provided for section 7.0 of the Title V permit for the current storage tank project.

EWVI is also requesting a few Title V permit language cleanup items:

- The emissions unit table in Section 1.0 of the permit shows TK-4012 and TK-4012 equipped with mechanical shoe type seals. The tanks are actually equipped with vapor mounted double-seal systems. We request the emissions unit table be updated to reflect the vapor mounted seal design.
- Title V permit Condition 5.1.9 contains a table of emissions limits. EWVI notes that the SO<sub>2</sub> emissions limit for the MLDOX contains a typographical error. The SO<sub>2</sub> limitation should have been listed as 1.64 TPY and 0.16 TPM from a previous permit modification.
- Title V permit Condition 5.1.10 contains a table of throughput limits. The last row of the table contains an operational limitation on non-pilot hours of operation of the Main/Sour Gas Flare. EWVI submitted a Class II Administrative permit application to revise the permit language related to the main and sour gas flares. As a part of this application, EWVI requested the hourly limit on non-pilot operation be removed. The subsequent permit R13-2334Z was issued by WVDEP on 11/30/2016 incorporating the revised permit language related to the flares; however, the non-pilot hour limit in the table was inadvertently overlooked and should have been removed. The R13 permit was later incorporated in the facility's Title V permit as modified on 6/5/2017. The hour limitation on the flare was again inadvertently overlooked in the Condition 5.1.10 table. At this time, EWVI requests the non-pilot hour limitation on the flare be removed.



Attachment U – Suggested Title V Language

Title V Operating Permit R30-02900008-2015 (MM02 and MM03)  
Ergon Corporation - West Virginia, Inc.

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| Emission Unit ID | Emission Point ID | Emission Unit Description                                           | Year Installed | Design Capacity   | Control Device |
|------------------|-------------------|---------------------------------------------------------------------|----------------|-------------------|----------------|
| 00P-01           | FWPUMP1           | Diesel Firewater Pump at River Dock                                 | 2006           | 350 hp            | N/A            |
| 00P-02           | FWPUMP2           | Diesel Firewater Pump at Boiler House                               | 1993           | 350 hp            | N/A            |
| Tanks            |                   |                                                                     |                |                   |                |
| 4000             | TK-4000           | External floating roof; crude oil; mechanical shoe                  | 1992           | 2,310,000 gallons | N/A            |
| 4001             | TK-4001           | External floating roof; crude oil; mechanical shoe                  | 1973           | 2,310,000 gallons | N/A            |
| 4002             | TK-4002           | External floating roof; heavy products or kerosene; mechanical shoe | 1970           | 2,310,000 gallons | N/A            |
| 4003             | TK-4003           | External floating roof; heavy products or kerosene; mechanical shoe | 1970           | 2,310,000 gallons | N/A            |
| 4004             | TK-4004           | External floating roof; gasoline; mechanical shoe                   | 1971/2018      | 1,260,000 gallons | N/A            |
| 4005             | TK-4005           | External floating roof; gasoline; mechanical shoe                   | 1971/2018      | 1,260,000 gallons | N/A            |
| 4006             | TK-4006           | External floating roof; gasoline; mechanical shoe                   | 1971/2018      | 1,260,000 gallons | N/A            |
| 4007             | TK-4007           | Fixed roof; heavy products                                          | 1971           | 2,310,000 gallons | N/A            |
| 4008             | TK-4008           | Fixed roof; heavy products                                          | 1970           | 1,260,000 gallons | N/A            |
| 4009             | TK-4009           | Fixed roof; heavy products or kerosene                              | 1971           | 1,260,000 gallons | N/A            |
| 4010             | TK-4010           | Fixed roof; heavy products                                          | 1970           | 1,260,000 gallons | N/A            |
| 4011             | TK-4011           | Fixed roof; heavy products or kerosene                              | 1971           | 1,239,568 gallons | N/A            |
| 4012             | TK-4012           | Internal floating roof; gasoline; Vapor-mounted                     | 1971           | 630,000 gallons   | N/A            |
| 4013             | TK-4013           | Internal floating roof; gasoline; Vapor-mounted                     | 1971           | 630,000 gallons   | N/A            |
| 4014             | TK-4014           | External floating roof; gasoline; mechanical shoe                   | 1971/2013      | 315,000 gallons   | N/A            |
| 4015             | TK-4015           | External floating roof; gasoline; mechanical shoe                   | 1971/2013      | 315,000 gallons   | N/A            |
| 4016             | TK-4016           | External floating roof; gasoline; mechanical shoe                   | 1971           | 315,000 gallons   | N/A            |
| 4017             | TK-4017           | Fixed roof; heavy products                                          | 1971           | 840,000 gallons   | N/A            |
| 4018             | TK-4018           | Fixed roof; heavy products                                          | 1971/2000      | 704,970 gallons   | N/A            |
| 4019             | TK-4019           | Fixed roof; heavy products                                          | 1971           | 704,970 gallons   | N/A            |
| 4020             | TK-4020           | Fixed roof; heavy products                                          | 1971           | 840,000 gallons   | N/A            |
| 4021             | TK-4021           | Fixed roof; heavy products                                          | 1971           | 840,000 gallons   | N/A            |
| 4022             | TK-4022           | Fixed roof; heavy products                                          | 1971           | 571,200 gallons   | N/A            |
| 4023             | TK-4023           | Fixed roof; heavy products                                          | 1971           | 571,200 gallons   | N/A            |
| 4024             | TK-4024           | Fixed roof; heavy products                                          | 1970           | 840,000 gallons   | N/A            |
| 4025             | TK-4025           | Fixed roof; heavy products                                          | 1970           | 840,000 gallons   | N/A            |
| 4026             | TK-4026           | Fixed roof; heavy products                                          | 1970           | 840,000 gallons   | N/A            |

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**Attachment U – Suggested Title V Language**

Title V Operating Permit R30-02900008-2015 (MM02 and MM03)  
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| <b>Emission Unit ID</b> | <b>Emission Point ID</b> | <b>Emission Unit Description</b>                                  | <b>Year Installed</b> | <b>Design Capacity</b>    | <b>Control Device</b> |
|-------------------------|--------------------------|-------------------------------------------------------------------|-----------------------|---------------------------|-----------------------|
| <a href="#">4070</a>    | <a href="#">TK-4070</a>  | <a href="#">Internal floating roof; ethanol</a>                   | <a href="#">2018</a>  | <a href="#">630,000</a>   | <a href="#">N/A</a>   |
| <a href="#">4071</a>    | <a href="#">TK-4071</a>  | <a href="#">External floating roof; gasoline; mechanical shoe</a> | <a href="#">2018</a>  | <a href="#">1,260,000</a> | <a href="#">N/A</a>   |
| <a href="#">4072</a>    | <a href="#">TK-4072</a>  | <a href="#">Fixed roof; feedstock tank</a>                        | <a href="#">2018</a>  | <a href="#">1,260,000</a> | <a href="#">N/A</a>   |

5.1.9. Emissions shall not exceed those listed below. Annual emission limits are based on a 12-month rolling basis.

|           | Emission Point ID |       |                  |       |                  |                  |                 |                  |       |      |
|-----------|-------------------|-------|------------------|-------|------------------|------------------|-----------------|------------------|-------|------|
|           | F1 (pilot light)  |       | F2 (pilot light) |       | TLOAD & OXIDIZER |                  | MLD & MLDOX     |                  | NH3OX |      |
|           | TPM               | TPY   | TPM              | TPY   | TPM              | TPY              | TPM             | TPY              | TPM   | TPY  |
| CO        | 0.007             | 0.074 | 0.013            | 0.129 | <del>0.21</del>  | <del>2.12</del>  | 0.27            | <del>2.67</del>  | 0.80  | 7.96 |
| NOx       | 0.009             | 0.088 | 0.015            | 0.153 | 0.04             | <del>0.39</del>  | 0.05            | <del>0.49</del>  | 0.05  | 0.5  |
| PM2.5     |                   |       |                  |       | 0.01             | 0.04             | 0.01            | 0.05             | 0.02  | 0.22 |
| PM10      | 0.001             | 0.007 | 0.001            | 0.012 | 0.01             | 0.04             | 0.01            | 0.05             | 0.02  | 0.22 |
| PM        |                   |       |                  |       | 0.01             | 0.04             | 0.01            | 0.05             | 0.02  | 0.22 |
| SO2       |                   |       |                  |       | <del>0.13</del>  | <del>1.26</del>  | <del>0.17</del> | <del>1.67</del>  | 0.01  | 0.02 |
| VOC       | 0.001             | 0.005 | 0.001            | 0.008 | <del>1.82</del>  | <del>18.17</del> | <del>1.22</del> | <del>12.24</del> | 0.10  | 1.00 |
| Total HAP |                   |       |                  |       | <del>0.32</del>  | <del>3.22</del>  | <del>0.13</del> | <del>1.30</del>  |       |      |
| Benzene   |                   |       |                  |       | 0.03             | <del>0.32</del>  | 0.01            | <del>0.08</del>  |       |      |

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- Deleted: 1.16
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5.1.10. The permittee shall not exceed the annual limits in the table below that correspond to the emission limits established in requirement 5.1.9. Annual quantities are based on a 12-month rolling basis.

| Throughput Limits                   |                                                                       |                      |
|-------------------------------------|-----------------------------------------------------------------------|----------------------|
| Location                            | Product                                                               | Quantity (Mgal/year) |
| Marine Loading                      | Gasoline                                                              | <del>40387</del>     |
|                                     | Light Crude Oil (including oil with a vapor pressure up to 11.0 psia) | 306600               |
|                                     | Diesel                                                                | 37065                |
|                                     | Kerosene                                                              | 46000                |
|                                     | Lube Oil/ Heavy Products                                              | 30660                |
| Truck Loading                       | Diesel                                                                | 134904               |
|                                     | Gasoline                                                              | <del>96960</del>     |
|                                     | No. 6 Fuel Oil                                                        | 13650                |
|                                     | Kerosene                                                              | 15330                |
|                                     | Lube Oil/ Heavy Products                                              | 136920               |
| <del>Operational Limits</del>       |                                                                       |                      |
| <del>Location</del>                 | <del>Product</del>                                                    | <del>Quantity</del>  |
| <del>Main/Sour Gas Flare [F1]</del> | <del>Non-Pilot emissions</del>                                        | <del>250 hours</del> |

Gasoline  
62,031 MGal/yr

Gasoline  
134,904 MGal/yr

Remove last three rows of table

**7.0 Tank Requirements**

**7.1. Limitations and Standards**

7.1.1. Storage tanks are limited to the raw material/ product type and throughput provided in the table below:

| Tank ID No.                                                                                                                                                                                                                            | Raw Material/Product Type (gallons/year)                       |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| 4000, 4001, 4060, 4061, and 4072                                                                                                                                                                                                       | crude oil (802,264,890)                                        |
| 4062 and 4063                                                                                                                                                                                                                          | light crude oil w/vapor pressure up to 11.0 psia (306,600,000) |
| 4004, 4005, 4006, 4012, 4013, 4014, 4015, 4016, 4050, 4052, 4053, 4070, and 4071                                                                                                                                                       | gasoline or ethanol (318,034,433)                              |
| 4002, 4003, 4009, 4011, 4054, 4055, 4056, and 4057                                                                                                                                                                                     | heavy products or kerosene (406,459,760)                       |
| 4007, 4008, 4010, 4017, 4018, 4019, 4020, 4021, 4022, 4023, 4024, 4025, 4026, 4027, 4028, 4029, 4030, 4031, 4032, 4033, 4034, 4035, 4036, 4037, 4038, 4039, 4040, 4041, 4042, 4043, 4044, 4045, 4046, 4047, 4048, 4051, 4103, and 4104 | heavy products (550,817,989)                                   |

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[45CSR13 - Permit R13-2334 - 7.1.1.]

7.1.2. Combined emissions from the tanks listed in section 7.1.1 shall not exceed the following:

| Pollutant | Emission Rate |       |
|-----------|---------------|-------|
|           | TPM           | TPY   |
| Total VOC | 5.79          | 57.85 |
| Benzene   | 0.08          | 0.81  |
| Total HAP | 0.65          | 6.54  |

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[45CSR13 - Permit R13-2334 - 7.1.2.]

7.1.3. Fixed roof Tanks 4012 and 4013 shall be equipped with internal floating roofs to minimize emissions of VOC's.

[45CSR13 - Permit R13-2334 - 7.1.3.]

7.1.4. The following slotted guidepole requirements apply to Tanks 4001, 4002, 4003, 4004, 4005, 4006, 4014, 4015, and 4016:

Deleted: 4000

- a. Each and every slotted guidepole that passes through the floating roof shall be equipped with one of the following: a pole float system; an alternate control technology that has an emission factor less than or equal to the emission factor for a pole float system; a pole sleeve system; an internal sleeve emission control system; a solid guidepole system; a flexible enclosure system; or
- b. In the alternative, the Permittee may elect to cover an external floating roof tank with a fixed roof mounted on the tank above the external floating roof, or remove the tank from the service storing

Attachment U – Suggested Title V Language

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Ergon - West Virginia, Inc.

liquids subject to NSPS Ka or Kb, modify the permit for that tank, and represent to the West Virginia Division of Air Quality that the tank will not be used to store certain petroleum liquids or volatile organic liquids.

- c. For systems that use a sliding cover, the sliding cover shall be in place over the slotted-guidepole opening in the floating roof at all times, except, when the sliding cover must be removed for access. If the control technology used includes a guidepole float, the float shall be floating within the guidepole at all times except when it must be removed for access to the stored liquid or when the tank is empty.
- d. The permittee shall visually inspect the deck fitting for the slotted guidepole at least once every ten (10) years and each time the vessel is emptied and degassed. If the slotted guidepole deck fitting or control device has defects, or if a gap that is more than 0.32 centimeters (1/8 inch) exists between any gasket required for control of the slotted guidepole deck fitting and any surface that it is intended to seal, such items shall be repaired before filling or refilling the storage vessel with regulated material.
- e. Tanks taken out of hydrocarbon service, for any reason, do not have to have any controls in place during the time they are taken out of service. Tanks taken out of service must have in place, prior to being put back into service, all controls necessary to remain below the emission limits set forth by the current version of permit R13-2334.

[45CSR13 - Permit R13-2334 - 7.1.4. and 7.1.5.]

- 7.1.5. The following 40 CFR 60 Subpart K requirements apply to ~~Tanks 4036, 4037, 4038, and 4039;~~

The owner or operator of any storage vessel to which 40 CFR Part 60 Subpart K applies shall store petroleum liquids as follows: if the true vapor pressure of the petroleum liquid, as stored, is equal to or greater than 78 mm Hg (1.5 psia) but not greater than 570 mm Hg (11.1 psia), the storage vessel shall be equipped with a floating roof, a vapor recovery system, or their equivalents.

[40 CFR § 60.112(a)(1) and 45CSR§16-2.1.; 45CSR13 - Permit R13-2334 - 7.1.6.]

- 7.1.6. The following 40 CFR 60 Subpart Ka requirements apply to ~~Tanks 4035, 4040, 4042, 4043, 4044, 4045, and 4046;~~

*Based on storage of heavy products, the following tanks are not subject to either the floating roof requirements or the closed vent system and control requirements of 40 CFR 60 Subpart Ka: 4035, 4040, 4042, 4043, 4044, 4045, and 4046.*

The owner or operator of each storage vessel to which 40 CFR Part 60 Subpart Ka applies which contains a petroleum liquid which, as stored, has a true vapor pressure equal to or greater than 10.3 kPa (1.5 psia) but not greater than 76.6 kPa (11.1 psia) shall equip the storage vessel with one of the following:

- (1) An external floating roof, consisting of a pontoon-type or double-deck-type cover that rests on the surface of the liquid contents and is equipped with a closure device between the tank wall and the roof edge. Except as provided in 40 CFR § 60.112a (a)(1)(ii)(D), the closure device is to consist of two seals, one above the other. The lower seal is referred to as the primary seal and the upper seal is referred to as the secondary seal. The roof is to be floating on the liquid at all times (i.e., off the roof leg supports) except during initial fill and when the tank is completely emptied and subsequently refilled. The process of emptying and refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible.

Deleted: 4001, 4035,

Deleted: , and 4041

**Attachment U – Suggested Title V Language**

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Ergon - West Virginia, Inc.

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- (i) The primary seal is to be either a metallic shoe seal, a liquid-mounted seal, or a vapor-mounted seal. Each seal is to meet the following requirements:
    - (A) The accumulated area of gaps between the tank wall and the metallic shoe seal or the liquid-mounted seal shall not exceed 212 cm<sup>2</sup> per meter of tank diameter (10.0 in<sup>2</sup> per ft of tank diameter) and the width of any portion of any gap shall not exceed 3.81 cm (1½ in).
    - (B) The accumulated area of gaps between the tank wall and the vapor-mounted seal shall not exceed 21.2 cm<sup>2</sup> per meter of tank diameter (1.0 in<sup>2</sup> per ft of tank diameter) and the width of any portion of any gap shall not exceed 1.27 cm (½ in).
    - (C) One end of the metallic shoe is to extend into the stored liquid and the other end is to extend a minimum vertical distance of 61 cm (24 in) above the stored liquid surface.
    - (D) There are to be no holes, tears, or other openings in the shoe, seal fabric, or seal envelope.
  - (ii) The secondary seal is to meet the following requirements:
    - (A) The secondary seal is to be installed above the primary seal so that it completely covers the space between the roof edge and the tank wall except as provided in 40 CFR § 60.112a (a)(1)(ii)(B).
    - (B) The accumulated area of gaps between the tank wall and the secondary seal used in combination with a metallic shoe or liquid-mounted primary seal shall not exceed 21.2 cm<sup>2</sup> per meter of tank diameter (1.0 in<sup>2</sup> per ft. of tank diameter) and the width of any portion of any gap shall not exceed 1.27 cm (½ in.). There shall be no gaps between the tank wall and the secondary seal used in combination with a vapor-mounted primary seal.
    - (C) There are to be no holes, tears or other openings in the seal or seal fabric.
    - (D) The owner or operator is exempted from the requirements for secondary seals and the secondary seal gap criteria when performing gap measurements or inspections of the primary seal.
  - (iii) Each opening in the roof except for automatic bleeder vents and rim space vents is to provide a projection below the liquid surface. Each opening in the roof except for automatic bleeder vents, rim space vents and leg sleeves is to be equipped with a cover, seal or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use or as described in 40 CFR § 60.112a (a)(1)(iv). Automatic bleeder vents are to be closed at all times when the roof is floating, except when the roof is being floated off or is being landed on the roof leg supports. Rim vents are to be set to open when the roof is being floated off the roof legs supports or at the manufacturer's recommended setting.
  - (iv) Each emergency roof drain is to be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening.
- (2) A fixed roof with an internal floating type cover equipped with a continuous closure device between the tank wall and the cover edge. The cover is to be floating at all times, (i.e., off the leg supports) except during initial fill and when the tank is completely emptied and subsequently refilled. The process of emptying and refilling when the cover is resting on the leg supports shall be continuous and shall be

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West Virginia Department of Environmental Protection • Division of Air Quality

Approved: August 18, 2015 • Modified: June 5, 2017

Attachment U – Suggested Title V Language

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accomplished as rapidly as possible. Each opening in the cover except for automatic bleeder vents and the rim space vents is to provide a projection below the liquid surface. Each opening in the cover except for automatic bleeder vents, rim space vents, stub drains and leg sleeves is to be equipped with a cover, seal, or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. Automatic bleeder vents are to be closed at all times when the cover is floating except when the cover is being floated off or is being landed on the leg supports. Rim vents are to be set to open only when the cover is being floated off the leg supports or at the manufacturer's recommended setting.

(3) A vapor recovery system which collects all VOC vapors and gases discharged from the storage vessel, and a vapor return or disposal system which is designed to process such VOC vapors and gases so as to reduce their emission to the atmosphere by at least 95 percent by weight.

(4) A system equivalent to those described in 40 CFR § 60.112a (a)(1), (a)(2), or (a)(3) as provided in 40 CFR § 60.114a.

[40 CFR § 60.112a (a) and 45CSR16]

7.1.7. The following 40 CFR 60 Subpart Kb requirements apply to Tanks ~~4000, 4004, 4005, 4006, 4034, 4047, 4048, 4050, 4051, 4054, 4055, 4056, 4057, 4060, 4061, 4062, 4063, 4070, and 4071~~:

*Based on storage of heavy products, the following tanks are not subject to either the floating roof requirements or the closed vent system and control requirements of 40 CFR 60 Subpart Kb: 4034, 4047, 4048, 4051, 4054, 4055, 4056, 4057.*

a. The owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m<sup>3</sup> containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa but less than 76.6 kPa or with a design capacity greater than or equal to 75 m<sup>3</sup> but less than 151 m<sup>3</sup> containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 27.6 kPa but less than 76.6 kPa, shall equip each storage vessel with one of the following:

1. A fixed roof in combination with an internal floating roof meeting the following specifications:

i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:

A. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

B. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage

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- vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
- C. A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- iii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
- v. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
- vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
- viii. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- ix. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
2. An external floating roof. An external floating roof means a pontoon-type or double-deck type cover that rests on the liquid surface in a vessel with no fixed roof. Each external floating roof must meet the following specifications:
- i. Each external floating roof shall be equipped with a closure device between the wall of the storage vessel and the roof edge. The closure device is to consist of two seals, one above the other. The lower seal is referred to as the primary seal, and the upper seal is referred to as the secondary seal.
- A. The primary seal shall be either a mechanical shoe seal or a liquid-mounted seal. Except as provided in 40 CFR § 60.113b(b)(4), the seal



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shall completely cover the annular space between the edge of the floating roof and tank wall.

- B. The secondary seal shall completely cover the annular space between the external floating roof and the wall of the storage vessel in a continuous fashion except as allowed in 40 CFR § 60.113b(b)(4).
  - ii. Except for automatic bleeder vents and rim space vents, each opening in a noncontact external floating roof shall provide a projection below the liquid surface. Except for automatic bleeder vents, rim space vents, roof drains, and leg sleeves, each opening in the roof is to be equipped with a gasketed cover, seal, or lid that is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. Automatic bleeder vents are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. Rim vents are to be set to open when the roof is being floated off the roof legs supports or at the manufacturer's recommended setting. Automatic bleeder vents and rim space vents are to be gasketed. Each emergency roof drain is to be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening.
  - iii. The roof shall be floating on the liquid at all times (i.e., off the roof leg supports) except during initial fill until the roof is lifted off leg supports and when the tank is completely emptied and subsequently refilled. The process of filling, emptying, or refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible.
- 3. A closed vent system and control device meeting the following specifications:
    - i. The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in 40 CFR part 60, subpart VV, § 60.485(b).
    - ii. The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. If a flare is used as the control device, it shall meet the specifications described in the general control device requirements (40 CFR § 60.18) of the General Provisions.
  - 4. A system equivalent to those described in paragraphs a.1., a.2., or a.3. above as provided in 40 CFR § 60.114b.
- b. The owner or operator of each storage vessel with a design capacity greater than or equal to 75 m<sup>3</sup> which contains a VOL that, as stored, has a maximum true vapor pressure greater than or equal to 76.6 kPa shall equip each storage vessel with one of the following:
    - 1. A closed vent system and control device as specified in 40 CFR § 60.112b(a)(3).
    - 2. A system equivalent to that described in paragraph b.1. above as provided in 40 CFR § 60.114b.

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**[40 CFR § 60.112b(a) and (b) and 45CSR§16-2.1.; 45CSR13 - Permit R13-2334 - 7.1.7.]**

West Virginia Department of Environmental Protection • Division of Air Quality

Approved: August 18, 2015 • Modified: June 5, 2017

## 7.2. Monitoring Requirements

7.2.1. Compliance with Section 7.1.4. may be determined by visual inspection by the Director or a duly authorized representative of the Director.  
**[45CSR13 - Permit R13-2334 - 7.2.1.]**

7.2.2. The following 40 CFR 60 Subpart Kb requirements apply to **Tanks 4000, 4004, 4005, 4006, 4034, 4047, 4048, 4050, 4051, 4054, 4055, 4056, 4057, 4060, 4061, 4062, 4063, 4070, and 4071:**  
*Based on storage of heavy products, the following tanks are not subject to either the floating roof requirements or the closed vent system and control requirements of 40 CFR 60 Subpart Kb: 4034, 4047, 4048, 4051, 4054, 4055, 4056, 4057.*

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The owner or operator of each storage vessel as specified in 40 CFR § 60.112b(a) shall meet the requirements of paragraph a., b., or c. of this section. The applicable paragraph for a particular storage vessel depends on the control equipment installed to meet the requirements of 40 CFR § 60.112b.

a. After installing the control equipment required to meet 40 CFR § 60.112b(a)(1) (permanently affixed roof and internal floating roof), each owner or operator shall:

1. Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.
2. For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in 40 CFR § 60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
3. For vessels equipped with a double-seal system as specified in § 60.112b(a)(1)(ii)(B) :
  - i. Visually inspect the vessel as specified in paragraph a.4. of this section at least every 5 years; or
  - ii. Visually inspect the vessel as specified in paragraph a.2. of this section.
4. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is

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emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs a.2. and a.3.ii. of this section and at intervals no greater than 5 years in the case of vessels specified in paragraph a.3.i. of this section.

5. Notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs a.1. and a.4. of this section to afford the Administrator the opportunity to have an observer present. If the inspection required by paragraph a.4. of this section is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Administrator at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator at least 7 days prior to the refilling.
- b. After installing the control equipment required to meet 40 CFR § 60.112b(a)(2) (external floating roof), the owner or operator shall:
1. Determine the gap areas and maximum gap widths, between the primary seal and the wall of the storage vessel and between the secondary seal and the wall of the storage vessel according to the following frequency.
    - i. Measurements of gaps between the tank wall and the primary seal (seal gaps) shall be performed during the hydrostatic testing of the vessel or within 60 days of the initial fill with VOL and at least once every 5 years thereafter.
    - ii. Measurements of gaps between the tank wall and the secondary seal shall be performed within 60 days of the initial fill with VOL and at least once per year thereafter.
    - iii. If any source ceases to store VOL for a period of 1 year or more, subsequent introduction of VOL into the vessel shall be considered an initial fill for the purposes of paragraphs b.1.i. and b.1.ii. of this section.
  2. Determine gap widths and areas in the primary and secondary seals individually by the following procedures:
    - i. Measure seal gaps, if any, at one or more floating roof levels when the roof is floating off the roof leg supports.
    - ii. Measure seal gaps around the entire circumference of the tank in each place where a 0.32-cm diameter uniform probe passes freely (without forcing or binding against

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- seal) between the seal and the wall of the storage vessel and measure the circumferential distance of each such location.
- iii. The total surface area of each gap described in paragraph b.2.ii. of this section shall be determined by using probes of various widths to measure accurately the actual distance from the tank wall to the seal and multiplying each such width by its respective circumferential distance.
3. Add the gap surface area of each gap location for the primary seal and the secondary seal individually and divide the sum for each seal by the nominal diameter of the tank and compare each ratio to the respective standards in paragraph b.4. of this section.
4. Make necessary repairs or empty the storage vessel within 45 days of identification in any inspection for seals not meeting the requirements listed in 40 CFR § 60.113b(b)(4) (i) and (ii).
5. Notify the Administrator 30 days in advance of any gap measurements required by paragraph b.1. of this section to afford the Administrator the opportunity to have an observer present.
6. Visually inspect the external floating roof, the primary seal, secondary seal, and fittings each time the vessel is emptied and degassed.
- i. If the external floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before filling or refilling the storage vessel with VOL.
- ii. For all the inspections required by paragraph b.6. of this section, the owner or operator shall notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel to afford the Administrator the opportunity to inspect the storage vessel prior to refilling. If the inspection required by paragraph b.6. of this section is not planned and the owner or operator could not have known about the inspection 30 days in advance of refilling the tank, the owner or operator shall notify the Administrator at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator at least 7 days prior to the refilling.
- c. The owner or operator of each source that is equipped with a closed vent system and control device as required in § 60.112b (a)(3) or (b)(2) (other than a flare) is exempt from § 60.8 of the General Provisions and shall meet the following requirements.
1. Submit for approval by the Administrator as an attachment to the notification required by § 60.7(a)(1) or, if the facility is exempt from § 60.7(a)(1), as an attachment to the notification required by § 60.7(a)(2), an operating plan containing the information listed below.

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- i. Documentation demonstrating that the control device will achieve the required control efficiency during maximum loading conditions. This documentation is to include a description of the gas stream which enters the control device, including flow and VOC content under varying liquid level conditions (dynamic and static) and manufacturer's design specifications for the control device. If the control device or the closed vent capture system receives vapors, gases, or liquids other than fuels from sources that are not designated sources under 40 CFR Part 60 subpart K, the efficiency demonstration is to include consideration of all vapors, gases, and liquids received by the closed vent capture system and control device. If an enclosed combustion device with a minimum residence time of 0.75 seconds and a minimum temperature of 816 °C is used to meet the 95 percent requirement, documentation that those conditions will exist is sufficient to meet the requirements of this paragraph.
  - ii. A description of the parameter or parameters to be monitored to ensure that the control device will be operated in conformance with its design and an explanation of the criteria used for selection of that parameter
2. Operate the closed vent system and control device and monitor the parameters of the closed vent system and control device in accordance with the operating plan submitted to the Administrator in accordance with paragraph c.1. of this section, unless the plan was modified by the Administrator during the review process. In this case, the modified plan applies.
- d. The owner or operator of each source that is equipped with a closed vent system and a flare to meet the requirements in § 60.112b (a)(3) or (b)(2) shall meet the requirements as specified in the general control device requirements, § 60.18 (e) and (f).

**[40 CFR § 60.113b and 45CSR§16-2.1.; 45CSR13 - Permit R13-2334 - 7.2.2., 7.2.3.]**

7.2.3. The following 40 CFR 60 Subpart Ka requirements apply to **Tanks 4035, 4040, 4042, 4043, 4044, 4045, and 4046:**

*Based on storage of heavy products, the following tanks are not subject to either the floating roof requirements or the closed vent system and control requirements of 40 CFR 60 Subpart Ka: 4035, 4040, 4042, 4043, 4044, 4045, and 4046.*

- a. Except as provided in 40 CFR §60.8(b) compliance with the standard prescribed in 40 CFR §60.112a shall be determined as follows or in accordance with an equivalent procedure as provided in 40 CFR §60.114a.
  1. The owner or operator of each storage vessel to which this subpart applies which has an external floating roof shall meet the following requirements:
    - i. Determine the gap areas and maximum gap widths between the primary seal and the tank wall and between the secondary seal and the tank wall according to the following frequency:
      - A. For primary seals, gap measurements shall be performed within 60 days of the initial fill with petroleum liquid and at least once every five years thereafter. All primary seal inspections or gap measurements which require the removal or dislodging of the

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- secondary seal shall be accomplished as rapidly as possible and the secondary seal shall be replaced as soon as possible.
- B. For secondary seals, gap measurements shall be performed within 60 days of the initial fill with petroleum liquid and at least once every year thereafter.
  - C. If any storage vessel is out of service for a period of one year or more, subsequent refilling with petroleum liquid shall be considered initial fill for the purposes of paragraphs 40 CFR §§ 60.113a(a)(1)(i)(A) and (a)(1)(i)(B).
  - D. Keep records of each gap measurement at the plant for a period of at least 2 years following the date of measurement. Each record shall identify the vessel on which the measurement was performed and shall contain the date of the seal gap measurement, the raw data obtained in the measurement process required by 40 CFR §60.113a(a)(1)(ii) and the calculation required by 40 CFR 60.113a(a)(1)(iii).
  - E. If either the seal gap calculated in accord with 40 CFR §60.113a (a)(1)(iii) or the measured maximum seal gap exceeds the limitations specified by 40 CFR §60.112a of this subpart, a report shall be furnished to the Administrator within 60 days of the date of measurements. The report shall identify the vessel and list each reason why the vessel did not meet the specifications of 40 CFR §60.112a. The report shall also describe the actions necessary to bring the storage vessel into compliance with the specifications of 40 CFR §60.112a.
- ii. Determine gap widths in the primary and secondary seals individually by the following procedures:
    - A. Measure seal gaps, if any, at one or more floating roof levels when the roof is floating off the roof leg supports.
    - B. Measure seal gaps around the entire circumference of the tank in each place where a 1/8" diameter uniform probe passes freely (without forcing or binding against seal) between the seal and the tank wall and measure the circumferential distance of each such location.
    - C. The total surface area of each gap described in 40 CFR §60.113a (a)(1)(ii)(B) shall be determined by using probes of various widths to accurately measure the actual distance from the tank wall to the seal and multiplying each such width by its respective circumferential distance.
  - iii. Add the gap surface area of each gap location for the primary seal and the secondary seal individually. Divide the sum for each seal by the nominal diameter of the tank and compare each ratio to the appropriate ratio in the standard in 40 CFR §60.112a(a)(1)(i) and §60.112a(a)(1)(ii).
  - iv. Provide the Administrator 30 days prior notice of the gap measurement to afford the Administrator the opportunity to have an observer present.

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2. The owner or operator of each storage vessel to which this subpart applies which has a vapor recovery and return or disposal system shall provide the following information to the Administrator on or before the date on which construction of the storage vessel commences:

- i. Emission data, if available, for a similar vapor recovery and return or disposal system used on the same type of storage vessel, which can be used to determine the efficiency of the system. A complete description of the emission measurement method used must be included.
- ii. The manufacturer's design specifications and estimated emission reduction capability of the system.
- iii. The operation and maintenance plan for the system.
- iv. Any other information which will be useful to the Administrator in evaluating the effectiveness of the system in reducing VOC emissions.

[40 CFR § 60.113a and 45CSR16]

### **7.3. Testing Requirements**

7.3.1. None.

### **7.4. Recordkeeping Requirements**

7.4.1. To determine compliance with the throughput limits set forth in Section 7.1.1. and the VOC emission limit set forth in Section 7.1.2., the permittee shall keep monthly records of throughput of each raw material/product for each tank. These records shall be kept individually, i.e. per tank. AP-42 emission factors for organic liquid storage tanks (Supp. D, Chapter 7.1), may be used to estimate yearly emissions.

[45CSR13 - Permit R13-2334 - 7.3.1.]

7.4.2. To determine compliance with the short-term and annual HAP emission limits set forth in Sections 7.1.2., the permittee shall estimate the emissions using a material balances calculation utilizing the vapor weight of HAPs present in petroleum liquids processed and transported at the facility. The following equation shall be to determine monthly and yearly emissions.

**HAP Emissions (tpm or tpy) = [(Individual HAP %) x (Actual VOC emissions, obtained from section 7.4.1. (tpm or tpy))/100**

Compliance with the yearly limit shall be based on a 12-month rolling total in accordance with Section 2.1.4. [45CSR13 - Permit R13-2334 - 7.3.2.; 45CSR§30-5.1.c.]

7.4.3. The following 40 CFR 60 Subpart K requirements apply to **Tanks 4036, 4037, 4038, 4039, and 4041:**

Except as provided in 40 CFR § 60.113(d), the owner or operator subject to 40 CFR Part 60 subpart K shall maintain a record of the petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period.

[40 CFR § 60.112(a) and 45CSR§16-2.1.; 45CSR13 - Permit R13-2334 - 7.3.3.]

7.4.4. The following 40 CFR 60 Subpart Ka requirements apply to **Tanks 4035, 4040, 4042, 4043, 4044, 4045, and 4046:**

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- a. Except as provided in 40 CFR §§ 60.115a (d), the owner or operator subject to 40 CFR Part 60 Subpart Ka shall maintain a record of the petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period.
- b. Available data on the typical Reid vapor pressure and the maximum expected storage temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517, unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).
- c. The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa (2.0 psia) or whose physical properties preclude determination by the recommended method is to be determined from available data and recorded if the estimated true vapor pressure is greater than 6.9 kPa (1.0 psia).

[40 CFR §§ 60.115a(a) through (c) and 45CSR16]

7.4.5. The following 40 CFR 60 Subpart Kb requirements apply to ~~Tanks 4000, 4004, 4005, 4006, 4034, 4047, 4048, 4050, 4051, 4052, 4055, 4056, 4057, 4060, 4061, 4062, 4063, 4070, and 4071:~~

*Based on storage of heavy products, the following tanks are not subject to either the floating roof requirements or the closed vent system and control requirements of 40 CFR 60 Subpart Kb: 4034, 4047, 4048, 4051, 4054, 4055, 4056, 4057.*

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The owner or operator of each storage vessel as specified in 40 CFR § 60.112b (a) shall keep records and furnish reports as required by 40 CFR § 60.115b (a), (b), or (c) depending upon the control equipment installed to meet the requirements of 40 CFR § 60.112b. The owner or operator shall keep copies of all reports and records required by this section, except for the record required by 40 CFR § 60.115b (c) (1), for at least 2 years. The record required by 40 CFR § 60.115b (c)(1) will be kept for the life of the control equipment.

- a. After installing control equipment in accordance with 40 CFR § 60.112b (a) (1) (fixed roof and internal floating roof), the owner or operator shall meet the following requirements.
  - 1. Furnish the Administrator with a report that describes the control equipment and certifies that the control equipment meets the specifications of 40 CFR § 60.112b (a)(1) and 40 CFR § 60.113b (a)(1). This report shall be an attachment to the notification required by 40 CFR § 60.7 (a)(3).
  - 2. Keep a record of each inspection performed as required by 40 CFR §§ 60.113b (a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
  - 3. If any of the conditions described in 40 CFR § 60.113b (a)(2) are detected during the annual visual inspection required by 40 CFR § 60.113b (a)(2), a report shall be furnished to the Administrator within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
  - 4. After each inspection required by 40 CFR § 60.113b (a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR § 60.113b (a)(3)(ii), a report shall be furnished to the Administrator within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR § 60.112b (a)(1) or 40 CFR § 60.113b (a)(3) and list each repair made.
- b. After installing control equipment in accordance with 40 CFR § 60.112b (a)(2) (external floating roof), the owner or operator shall meet the following requirements.



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1. Furnish the Administrator with a report that describes the control equipment and certifies that the control equipment meets the specifications of 40 CFR § 60.112b (a)(2) and 40 CFR § 60.113b (b)(2), (b)(3), and (b)(4). This report shall be an attachment to the notification required by 40 CFR § 60.7(a)(3).
  2. Within 60 days of performing the seal gap measurements required by 40 CFR § 60.113b (b)(1), furnish the Administrator with a report that contains:
    - i. The date of measurement.
    - ii. The raw data obtained in the measurement.
    - iii. The calculations described in 40 CFR §§ 60.113b (b)(2) and (b)(3).
  3. Keep a record of each gap measurement performed as required by 40 CFR § 60.113b (b). Each record shall identify the storage vessel in which the measurement was performed and shall contain:
    - i. The date of measurement.
    - ii. The raw data obtained in the measurement.
    - iii. The calculations described in 40 CFR §§ 60.113b (b)(2) and (b)(3).
  4. After each seal gap measurement that detects gaps exceeding the limitations specified by 40 CFR § 60.113b (b)(4), submit a report to the Administrator within 30 days of the inspection. The report will identify the vessel and contain the information specified in 40 CFR § 60.115b (b)(2) and the date the vessel was emptied or the repairs made and date of repair.
- c. After installing control equipment in accordance with 40 CFR §§ 60.112b (a)(3) or (b)(1) (closed vent system and control device other than a flare), the owner or operator shall keep the following records.
1. A copy of the operating plan.
  2. A record of the measured values of the parameters monitored in accordance with 40 CFR § 60.113b(c)(2).
- d. After installing a closed vent system and flare to comply with 40 CFR § 60.112b, the owner or operator shall meet the following requirements.
1. A report containing the measurements required by 40 CFR §§ 60.18 (f)(1), (2), (3), (4), (5), and (6) shall be furnished to the Administrator as required by 40 C.F.R. § 60.8 of the General Provisions. This report shall be submitted within 6 months of the initial start-up date.
  2. Records shall be kept of all periods of operation during which the flare pilot flame is absent.
  3. Semiannual reports of all periods recorded under 40 CFR § 60.115b (d)(2) in which the pilot flame was absent shall be furnished to the Administrator.
- [40 CFR § 60.115b, 45CSR§16-2.1; 45CSR13: Permit R13-2334, 7.3.4.]

7.4.6. The following 40 CFR 60 Subpart Kb requirements apply to Tanks ~~4000, 4004, 4005, 4006, 4034, 4047, 4048, 4050, 4051, 4054, 4055, 4056, 4057, 4060, 4061, 4062, 4063, 4070, and 4071~~:

- Deleted: 4001,
- Deleted: 4014, 4015, 4018,
- Deleted: 4052, 4053,
- Deleted: and

**Attachment U – Suggested Title V Language**

Title V Operating Permit R30-02900008-2015 (MM02 and MM03)

Ergon - West Virginia, Inc.

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- a. The owner or operator shall keep copies of all records required by 40 CFR Part 60 Subpart Kb, except for the record required by paragraph (b) of this section, for at least 2 years. The record required by paragraph (b) of this section will be kept for the life of the source.
- b. The owner or operator of each storage vessel as specified in 40 CFR § 60.110b (a) shall keep readily accessible records showing the dimension and an analysis showing the capacity of the storage vessel.
- c. Except as provided in paragraphs (f) and (g) of this section, the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa or with a design capacity greater than or equal to 75 m<sup>3</sup> but less than 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure greater than or equal to 15.0 kPa shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.
- d. Except as provided in paragraph (g) of this section, the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa or with a design capacity greater than or equal to 75 m<sup>3</sup> but less than 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure that is normally less than 27.6 kPa shall notify the Administrator within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range.
- e. Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below.
  1. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
  2. For crude oil or refined petroleum products the vapor pressure may be obtained by the following:
    - i. Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference -- see § 60.17), unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).
    - ii. The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.
- f. The owner or operator of each vessel storing a waste mixture of indeterminate or variable composition shall be subject to the following requirements.
  1. Prior to the initial filling of the vessel, the highest maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in paragraph (e) of this section.
  2. For vessels in which the vapor pressure of the anticipated liquid composition is above the cutoff for monitoring but below the cutoff for controls as defined in 40 CFR §60.112b(a), an initial

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physical test of the vapor pressure is required; and a physical test at least once every 6 months thereafter is required as determined by the following methods:

- i. ASTM D2879-83, 96, or 97 (incorporated by reference -- see 40 CFR § 60.17); or
  - ii. ASTM D323-82 or 94 (incorporated by reference -- see 40 CFR § 60.17); or
  - iii. As measured by an appropriate method as approved by the Administrator.
- g. The owner or operator of each vessel equipped with a closed vent system and control device meeting the specification of 40 CFR § 60.112b or with emissions reductions equipment as specified in 40 CFR § 65.42(b)(4), (b)(5), (b)(6), or (c) is exempt from the requirements of paragraphs (c) and (d) of this section. [40 CFR § 60.116b, 45CSR§16-2.1, 45CSR13: Permit R13-2334, 7.3.5.]

**7.5. Reporting Requirements**

7.5.1. None.

**7.6. Compliance Plan**

7.6.1. None.

## ATTACHMENT V - SUGGESTED R13 LANGUAGE

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## ATTACHMENT V - R13 PERMIT SUGGESTED LANGUAGE

Suggested language is provided for section 7.0 of the R13 permit for the current storage tank project.

EWVI is also requesting a few R13 permit language cleanup items:

- The emissions unit table in Section 1.0 of the permit shows TK-4012 and TK-4012 equipped with mechanical shoe type seals. The tanks are actually equipped with vapor mounted double-seal systems. We request the emissions unit table be updated to reflect the vapor mounted seal design.
- R13-2334 Condition 5.1.9 contains a table of emissions limits. EWVI notes that the SO<sub>2</sub> emissions limit for the MLDOX contains a typographical error. The SO<sub>2</sub> limitation should have been listed as 1.64 TPY and 0.16 TPM from a previous permit modification.
- R13-2334 Condition 5.1.10 contains a table of throughput limits. The last row of the table contains an operational limitation on non-pilot hours of operation of the Main/Sour Gas Flare. EWVI submitted a Class II Administrative permit application to revise the permit language related to the main and sour gas flares. As a part of this application, EWVI requested the hourly limit on non-pilot flare operation be removed. The subsequent permit R13-2334Z was issued by WVDEP on 11/30/2016 incorporating the revised permit language related to the flares; however, the non-pilot hour limit in the table was inadvertently overlooked and should have been removed. At this time, EWVI requests the non-pilot hour limitation on the flare be removed.

| 00B-02           | EQLEAKS           | Equipment Leak Fugitives                |                     |             | NA             | NA                                            | n/a            |
|------------------|-------------------|-----------------------------------------|---------------------|-------------|----------------|-----------------------------------------------|----------------|
| 00D-01           | Dehy Htr          | Dehydration Heater                      |                     |             | 1991           | 0.59<br>MMBtu/hr                              | n/a            |
| 00D-02           | Still             | Glycol Dehydration Still                |                     |             | 1991           | N/A                                           | n/a            |
| EPN 01           | H-901             | DHT Heater                              |                     |             | 2005           | 27.5<br>MMBtu/hr                              | n/a            |
| EPN 03           | H-1101            | Hydrogen Plant Heater                   |                     |             | 2005           | 38.8<br>MMBtu/hr                              | n/a            |
| 00A-04           | MLDOX             | Barge Loading Thermal Oxidizer          |                     |             | 2012           | 59.0<br>MMBtu/hr<br><br>98% min<br>efficiency | n/a            |
| <b>Tanks</b>     |                   |                                         |                     |             |                |                                               |                |
| Emission Unit ID | Emission Point ID | Emission Unit Description               | Contents            | Designation | Year Installed | Design / Permitted Capacity                   | Control Device |
| 4000             | TK-4000           | External floating roof; mechanical shoe | crude oil           | Kb          | 1992/<br>2012  | 2,310,000<br>gallons                          | n/a            |
| 4001             | TK-4001           | External floating roof; mechanical shoe | crude oil           | Kb          | 1973/<br>2012  | 2,310,000<br>gallons                          | n/a            |
| 4002             | TK-4002           | External floating roof; mechanical shoe | heavy/<br>kerosene  |             | 1970           | 2,310,000<br>gallons                          | n/a            |
| 4003             | TK-4003           | External floating roof; mechanical shoe | heavy /<br>kerosene |             | 1970           | 2,310,000<br>gallons                          | n/a            |
| 4004             | TK-4004           | External floating roof; mechanical shoe | gasoline            | Kb          | 1971/<br>2018  | 1,260,000<br>gallons                          | n/a            |
| 4005             | TK-4005           | External floating roof; mechanical shoe | gasoline            | Kb          | 1971<br>2018   | 1,260,000<br>gallons                          | n/a            |
| 4006             | TK-4006           | External floating roof; mechanical shoe | gasoline            | Kb          | 1971/<br>2018  | 1,260,000<br>gallons                          | n/a            |
| 4007             | TK-4007           | Fixed roof                              | heavy               |             | 1971           | 2,310,000<br>gallons                          | n/a            |
| 4008             | TK-4008           | Fixed roof                              | heavy               |             | 1970           | 1,260,000<br>gallons                          | n/a            |

| Emission Unit ID | Emission Point ID | Emission Unit Description                             | Contents         | Designation | Year Installed | Design / Permitted Capacity | Control Device |
|------------------|-------------------|-------------------------------------------------------|------------------|-------------|----------------|-----------------------------|----------------|
| 4009             | TK-4009           | Fixed roof                                            | heavy / kerosene |             | 1971           | 1,260,000 gallons           | n/a            |
| 4010             | TK-4010           | Fixed roof                                            | heavy            |             | 1970           | 1,260,000 gallons           | n/a            |
| 4011             | TK-4011           | Fixed roof                                            | heavy / kerosene |             | 1971           | 1,239,568 gallons           | n/a            |
| 4012             | TK-4012           | Internal floating roof; <del>shoe</del> Vapor-mounted | gasoline         |             | 1971           | 630,000 gallons             | n/a            |
| 4013             | TK-4013           | Internal floating roof; <del>shoe</del> Vapor-mounted | gasoline         |             | 1971           | 630,000 gallons             | n/a            |
| 4014             | TK-4014           | External floating roof; mechanical shoe               | gasoline         |             | 1971/<br>2013  | 315,000 gallons             | n/a            |
| 4015             | TK-4015           | External floating roof; mechanical shoe               | gasoline         |             | 1971/<br>2013  | 315,000 gallons             | n/a            |
| 4016             | TK-4016           | External floating roof; mechanical shoe               | gasoline         |             | 1971           | 315,000 gallons             | n/a            |
| 4017             | TK-4017           | Fixed roof                                            | heavy            |             | 1971           | 840,000 gallons             | n/a            |
| 4018             | TK-4018           | Fixed roof                                            | heavy            |             | 1971           | 704,970 gallons             | n/a            |
| 4019             | TK-4019           | Fixed roof                                            | heavy            |             | 1971           | 704,970 gallons             | n/a            |
| 4020             | TK-4020           | Fixed roof                                            | heavy            |             | 1971           | 840,000 gallons             | n/a            |
| 4021             | TK-4021           | Fixed roof                                            | heavy            |             | 1971           | 840,000 gallons             | n/a            |
| 4022             | TK-4022           | Fixed roof                                            | heavy            |             | 1971           | 571,200 gallons             | n/a            |
| 4023             | TK-4023           | Fixed roof                                            | heavy            |             | 1971           | 571,200 gallons             | n/a            |
| 4024             | TK-4024           | Fixed roof                                            | heavy            |             | 1970           | 840,000 gallons             | n/a            |
| 4025             | TK-4025           | Fixed roof                                            | heavy            |             | 1970           | 840,000 gallons             | n/a            |
| 4026             | TK-4026           | Fixed roof                                            | heavy            |             | 1970           | 840,000 gallons             | n/a            |

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| <u>Emissions Unit ID</u> | <u>Emissions Point ID</u> | <u>Emission Unit Description</u>        | <u>Contents</u> | <u>Designation</u> | <u>Year Installed</u> | <u>Design/ Permitted Capacity</u> | <u>Control Device</u> |
|--------------------------|---------------------------|-----------------------------------------|-----------------|--------------------|-----------------------|-----------------------------------|-----------------------|
| 4070                     | TK-4070                   | Internal Floating Roof, mechanical shoe | Ethanol         | Kb                 | 2018                  | 630,000 gal                       | n/a                   |
| 4071                     | TK-4071                   | External floating roof; mechanical shoe | Gasoline        | Kb                 | 2018                  | 1,260,000 gal                     | n/a                   |
| 4072                     | TK-4072                   | Fixed Roof                              | Feedstock       |                    | 2018                  | 1,260,000 gal                     | n/a                   |



Attachment V – Suggested R13 Language

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5.1.9. Emissions shall not exceed those listed below. Annual emission limits are based on a 12-month rolling basis.

|           | Emission Point ID |       |                  |       |                  |                  |                 |                  |       |      |
|-----------|-------------------|-------|------------------|-------|------------------|------------------|-----------------|------------------|-------|------|
|           | F1 (pilot light)  |       | F2 (pilot light) |       | TLOAD & OXIDIZER |                  | MLD & MLDOX     |                  | NH3OX |      |
|           | TPM               | TPY   | TPM              | TPY   | TPM              | TPY              | TPM             | TPY              | TPM   | TPY  |
| CO        | 0.007             | 0.074 | 0.013            | 0.129 | <del>0.21</del>  | <del>2.12</del>  | 0.27            | <del>2.67</del>  | 0.80  | 7.96 |
| NOx       | 0.009             | 0.088 | 0.015            | 0.153 | 0.04             | <del>0.39</del>  | 0.05            | <del>0.49</del>  | 0.05  | 0.5  |
| PM2.5     |                   |       |                  |       | 0.01             | 0.04             | 0.01            | 0.05             | 0.02  | 0.22 |
| PM10      | 0.001             | 0.007 | 0.001            | 0.012 | 0.01             | 0.04             | 0.01            | 0.05             | 0.02  | 0.22 |
| PM        |                   |       |                  |       | 0.01             | 0.04             | 0.01            | 0.05             | 0.02  | 0.22 |
| SO2       |                   |       |                  |       | <del>0.13</del>  | <del>1.26</del>  | <del>0.19</del> | <del>1.85</del>  | 0.01  | 0.02 |
| VOC       | 0.001             | 0.005 | 0.001            | 0.008 | <del>1.82</del>  | <del>18.17</del> | <del>1.22</del> | <del>12.24</del> | 0.10  | 1.00 |
| Total HAP |                   |       |                  |       | <del>0.32</del>  | <del>3.22</del>  | <del>0.13</del> | <del>1.30</del>  |       |      |
| Benzene   |                   |       |                  |       | 0.03             | <del>0.32</del>  | 0.01            | <del>0.08</del>  |       |      |

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5.1.10. The permittee shall not exceed the annual limits in the table below that correspond to the emission limits established in requirement 5.1.9. Annual quantities are based on a 12-month rolling basis.

| Throughput Limits                   |                                                                       |                      |
|-------------------------------------|-----------------------------------------------------------------------|----------------------|
| Location                            | Product                                                               | Quantity (Mgal/year) |
| Marine Loading                      | Gasoline                                                              | <del>40387</del>     |
|                                     | Light Crude Oil (including oil with a vapor pressure up to 11.0 psia) | 306600               |
|                                     | Diesel                                                                | 37065                |
|                                     | Kerosene                                                              | 46000                |
|                                     | Lube Oil/ Heavy Products                                              | 30660                |
| Truck Loading                       | Diesel                                                                | 134904               |
|                                     | Gasoline                                                              | <del>96960</del>     |
|                                     | No. 6 Fuel Oil                                                        | 13650                |
|                                     | Kerosene                                                              | 15330                |
|                                     | Lube Oil/ Heavy Products                                              | 136920               |
| <del>Operational Limits</del>       |                                                                       |                      |
| <del>Location</del>                 | <del>Product</del>                                                    | <del>Quantity</del>  |
| <del>Main/Sour Gas Flare [F1]</del> | <del>Non-Pilot emissions</del>                                        | <del>250 hours</del> |

Gasoline 62,031 MGal/yr

Gasoline 134,904 MGal/yr

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**7.0 Tank Requirements****7.1 Limitations and Standards**

7.1.1. Storage tanks are limited to the raw material/ product type and throughput provided in the table below:

| Tank ID No.                                                                                                                                                                                                                            | Raw Material/Product Type (gallons/year)                       |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| 4000, 4001, 4060, 4061, and 4072                                                                                                                                                                                                       | crude oil (802,264,890)                                        |
| 4062 and 4063                                                                                                                                                                                                                          | light crude oil w/vapor pressure up to 11.0 psia (306,600,000) |
| 4004, 4005, 4006, 4012, 4013, 4014, 4015, 4016, 4050, 4052, 4053, 4070, and 4071                                                                                                                                                       | gasoline or ethanol ( <del>318,034,433</del> )                 |
| 4002, 4003, 4009, 4011, 4054, 4055, 4056, and 4057                                                                                                                                                                                     | heavy products or kerosene (406,459,760)                       |
| 4007, 4008, 4010, 4017, 4018, 4019, 4020, 4021, 4022, 4023, 4024, 4025, 4026, 4027, 4028, 4029, 4030, 4031, 4032, 4033, 4034, 4035, 4036, 4037, 4038, 4039, 4040, 4041, 4042, 4043, 4044, 4045, 4046, 4047, 4048, 4051, 4103, and 4104 | heavy products (550,817,989)                                   |

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7.1.2. Combined emissions from the tanks listed in section 7.1.1 shall not exceed the following:

| Pollutant | Emission Rate   |                  |
|-----------|-----------------|------------------|
|           | TPM             | TPY              |
| Total VOC | <del>5.79</del> | <del>57.85</del> |
| Benzene   | 0.08            | 0.81             |
| Total HAP | 0.65            | 6.54             |

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7.1.3. Fixed roof **Tanks 4012 and 4013** shall be equipped with internal floating roofs to minimize emissions of VOC's.

7.1.4. The following requirements apply to **Tanks 4004, 4005, 4006, 4014, 4015, and 4016**:

- a. Each and every slotted guidepole that passes through the floating roof shall be equipped with one of the following: a pole float system; an alternate control technology that has an emission factor less than or equal to the emission factor for a pole float system; a pole sleeve system; an internal sleeve emission control system; a solid guidepole system; a flexible enclosure system; or
- b. In the alternative, the Permittee may elect to:
  1. Cover an external floating roof tank with a fixed roof mounted on the tank above the external floating roof, or
  2. Remove the tank from the service storing liquids subject to NSPS Ka or Kb, modify the permit for that tank, and represent to the West Virginia Division of Air Quality that the tank will not be used to store certain petroleum liquids or volatile organic liquids.

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- c. For systems that use a sliding cover, the sliding cover shall be in place over the slotted-guidepole opening in the floating roof at all times, except, when the sliding cover must be removed for access. If the control technology used includes a guidepole float, the float shall be floating within the guidepole at all times except when it must be removed for access to the stored liquid or when the tank is empty.
- d. The permittee shall visually inspect the deck fitting for the slotted guidepole at least once every ten (10) years and each time the vessel is emptied and degassed. If the slotted guidepole deck fitting or control device has defects, or if a gap that is more than 0.32 centimeters (1/8 inch) exists between any gasket required for control of the slotted guidepole deck fitting and any surface that it is intended to seal, such items shall be repaired before filling or refilling the storage vessel with regulated material.
- e. Tanks taken out of hydrocarbon service, for any reason, do not have to have any controls in place during the time they are taken out of service. Tanks taken out of service must have in place, prior to being put back into service, all controls necessary to remain below the emission limits set forth by the current version of permit R13-2334.

7.1.5. The following requirements apply to ~~Tanks 4001, 4002, and 4003:~~

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- a. Each and every slotted guidepole that passes through the floating roof shall be equipped with one of the following: a pole float system; an alternate control technology that has an emission factor less than or equal to the emission factor for a pole float system; a pole sleeve system; an internal sleeve emission control system; a solid guidepole system; a flexible enclosure system; or
- b. In the alternative, the Permittee may elect to:
  - 1. Cover an external floating roof tank with a fixed roof mounted on the tank above the external floating roof, or
  - 2. Remove the tank from the service storing liquids subject to NSPS Ka or Kb, modify the permit for that tank, and represent to the West Virginia Division of Air Quality that the tank will not be used to store certain petroleum liquids or volatile organic liquids.
- c. For systems that use a sliding cover, the sliding cover shall be in place over the slotted-guidepole opening in the floating roof at all times, except, when the sliding cover must be removed for access. If the control technology used includes a guidepole float, the float shall be floating within the guidepole at all times except when it must be removed for access to the stored liquid or when the tank is empty.
- d. The permittee shall visually inspect the deck fitting for the slotted guidepole at least once every ten (10) years and each time the vessel is emptied and degassed. If the slotted guidepole deck fitting or control device has defects, or if a gap that is more than 0.32 centimeters (1/8 inch) exists between any gasket required for control of the slotted guidepole deck fitting and any surface that it is intended to seal, such items shall be repaired before filling or refilling the storage vessel with regulated material.
- e. Tanks taken out of hydrocarbon service, for any reason, do not have to have any controls in place during the time they are taken out of service. Tanks taken out of service must have in place, prior to being put back into service, all controls necessary to remain below the emission limits set forth by the current version of permit R13-2334.

7.1.6. The following ~~40 CFR 60 Subpart K~~ requirements apply to ~~Tanks 4036, 4037, 4038, and 4039:~~

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The owner or operator of any storage vessel to which 40 CFR Part 60 Subpart K applies shall store petroleum liquids as follows: if the true vapor pressure of the petroleum liquid, as stored, is equal to or greater than 78 mm

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Hg (1.5 psia) but not greater than 570 mm Hg (11.1 psia), the storage vessel shall be equipped with a floating roof, a vapor recovery system, or their equivalents.

7.1.7. The following 40 CFR 60 Subpart Kb requirements apply to Tanks ~~4000, 4004, 4005, 4006, 4034, 4047, 4048, 4050, 4051, 4054, 4055, 4056, 4057, 4060, 4061, 4062, 4063, 4070, and 4071.~~

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*Based on storage of heavy products, the following tanks are not subject to either the floating roof requirements or the closed vent system and control requirements of 40 CFR 60 Subpart Kb: 4034, 4047, 4048, 4051, 4054, 4055, 4056, and 4057.*

a. The owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m<sup>3</sup> containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa but less than 76.6 kPa or with a design capacity greater than or equal to 75 m<sup>3</sup> but less than 151 m<sup>3</sup> containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 27.6 kPa but less than 76.6 kPa, shall equip each storage vessel with one of the following:

1. A fixed roof in combination with an internal floating roof meeting the following specifications:

i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:

A. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

B. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.

C. A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.

iii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

- iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
  - v. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
  - vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
  - vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
  - viii. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
  - ix. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
2. An external floating roof. An external floating roof means a pontoon-type or double-deck type cover that rests on the liquid surface in a vessel with no fixed roof. Each external floating roof must meet the following specifications:
- i. Each external floating roof shall be equipped with a closure device between the wall of the storage vessel and the roof edge. The closure device is to consist of two seals, one above the other. The lower seal is referred to as the primary seal, and the upper seal is referred to as the secondary seal.
    - A. The primary seal shall be either a mechanical shoe seal or a liquid-mounted seal. Except as provided in 40 CFR § 60.113b(b)(4), the seal shall completely cover the annular space between the edge of the floating roof and tank wall.
    - B. The secondary seal shall completely cover the annular space between the external floating roof and the wall of the storage vessel in a continuous fashion except as allowed in 40 CFR § 60.113b(b)(4).
  - ii. Except for automatic bleeder vents and rim space vents, each opening in a noncontact external floating roof shall provide a projection below the liquid surface. Except for automatic bleeder vents, rim space vents, roof drains, and leg sleeves, each opening in the roof is to be equipped with a gasketed cover, seal, or lid that is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. Automatic bleeder vents are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed

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on the roof leg supports. Rim vents are to be set to open when the roof is being floated off the roof legs supports or at the manufacturer's recommended setting. Automatic bleeder vents and rim space vents are to be gasketed. Each emergency roof drain is to be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening.

iii. The roof shall be floating on the liquid at all times (i.e., off the roof leg supports) except during initial fill until the roof is lifted off leg supports and when the tank is completely emptied and subsequently refilled. The process of filling, emptying, or refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible.

3. A closed vent system and control device meeting the following specifications:

i. The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in 40 CFR part 60, subpart VV, § 60.485(b).

ii. The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. If a flare is used as the control device, it shall meet the specifications described in the general control device requirements (40 CFR § 60.18) of the General Provisions.

4. A system equivalent to those described in paragraphs a.1., a.2., or a.3. above as provided in 40 CFR § 60.114b.

b. The owner or operator of each storage vessel with a design capacity greater than or equal to 75 m<sup>3</sup> which contains a VOL that, as stored, has a maximum true vapor pressure greater than or equal to 76.6 kPa shall equip each storage vessel with one of the following:

1. A closed vent system and control device as specified in 40 CFR § 60.112b(a)(3).

2. A system equivalent to that described in paragraph b.1. above as provided in 40 CFR § 60.114b.

[40 CFR § 60.112b(a) and (b) and 45CSR§16-2.1]

7.2. Monitoring Requirements

7.2.1. Compliance with Section 7.1.4. ~~and 7.1.5~~ may be determined by visual inspection by the Director or a duly authorized representative of the Director.

7.2.2. The following 40 CFR 60 Subpart Kb requirements apply to Tanks ~~4000, 4004, 4005, 4006, 4034, 4047, 4048, 4050, 4051, 4054, 4055, 4056, 4057, 4060, 4061, 4062, 4063, 4070, and 4071~~: *Based on storage of heavy products, the following tanks are not subject to either the floating roof requirements or the closed vent system and control requirements of 40 CFR 60 Subpart Kb: 4034, 4047, 4048, 4051, 4054, 4055, 4056, and 4057.*

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The owner or operator of each storage vessel as specified in 40 CFR § 60.112b(a) shall meet the requirements of paragraph a., b., or c. of this section. The applicable paragraph for a particular storage vessel depends on the control equipment installed to meet the requirements of 40 CFR § 60.112b.

- a. After installing the control equipment required to meet 40 CFR § 60.112b(a)(1) (permanently affixed roof and internal floating roof), each owner or operator shall:
  1. Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.
  2. For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in 40 CFR § 60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
  3. For vessels equipped with a double-seal system as specified in § 60.112b(a)(1)(ii)(B) :
    - i. Visually inspect the vessel as specified in paragraph a.4. of this section at least every 5 years; or
    - ii. Visually inspect the vessel as specified in paragraph a.2. of this section.
  4. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs a.2. and a.3.ii. of this section and at intervals no greater than 5 years in the case of vessels specified in paragraph a.3.i. of this section.
  5. Notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs a.1. and a.4. of this section to afford the Administrator the opportunity to have an observer present. If the inspection required by paragraph a.4. of this section is not planned and the owner or operator could not

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have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Administrator at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator at least 7 days prior to the refilling.

- b. After installing the control equipment required to meet 40 CFR § 60.112b(a)(2) (external floating roof), the owner or operator shall:
1. Determine the gap areas and maximum gap widths, between the primary seal and the wall of the storage vessel and between the secondary seal and the wall of the storage vessel according to the following frequency.
    - i. Measurements of gaps between the tank wall and the primary seal (seal gaps) shall be performed during the hydrostatic testing of the vessel or within 60 days of the initial fill with VOL and at least once every 5 years thereafter.
    - ii. Measurements of gaps between the tank wall and the secondary seal shall be performed within 60 days of the initial fill with VOL and at least once per year thereafter.
    - iii. If any source ceases to store VOL for a period of 1 year or more, subsequent introduction of VOL into the vessel shall be considered an initial fill for the purposes of paragraphs b.1.i. and b.1.ii. of this section.
  2. Determine gap widths and areas in the primary and secondary seals individually by the following procedures:
    - i. Measure seal gaps, if any, at one or more floating roof levels when the roof is floating off the roof leg supports.
    - ii. Measure seal gaps around the entire circumference of the tank in each place where a 0.32-cm diameter uniform probe passes freely (without forcing or binding against seal) between the seal and the wall of the storage vessel and measure the circumferential distance of each such location.
    - iii. The total surface area of each gap described in paragraph b.2.ii. of this section shall be determined by using probes of various widths to measure accurately the actual distance from the tank wall to the seal and multiplying each such width by its respective circumferential distance.
  3. Add the gap surface area of each gap location for the primary seal and the secondary seal individually and divide the sum for each seal by the nominal diameter of the tank and compare each ratio to the respective standards in paragraph b.4. of this section.
  4. Make necessary repairs or empty the storage vessel within 45 days of identification in any inspection for seals not meeting the requirements listed in 40 CFR § 60.113b(b)(4) (i) and (ii).



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5. Notify the Administrator 30 days in advance of any gap measurements required by paragraph b.1. of this section to afford the Administrator the opportunity to have an observer present.
6. Visually inspect the external floating roof, the primary seal, secondary seal, and fittings each time the vessel is emptied and degassed.
  - i. If the external floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before filling or refilling the storage vessel with VOL.
  - ii. For all the inspections required by paragraph b.6. of this section, the owner or operator shall notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel to afford the Administrator the opportunity to inspect the storage vessel prior to refilling. If the inspection required by paragraph b.6. of this section is not planned and the owner or operator could not have known about the inspection 30 days in advance of refilling the tank, the owner or operator shall notify the Administrator at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator at least 7 days prior to the refilling.
- c. The owner or operator of each source that is equipped with a closed vent system and control device as required in § 60.112b (a)(3) or (b)(2) (other than a flare) is exempt from § 60.8 of the General Provisions and shall meet the following requirements.
  1. Submit for approval by the Administrator as an attachment to the notification required by § 60.7(a)(1) or, if the facility is exempt from § 60.7(a)(1), as an attachment to the notification required by § 60.7(a)(2), an operating plan containing the information listed below.
    - i. Documentation demonstrating that the control device will achieve the required control efficiency during maximum loading conditions. This documentation is to include a description of the gas stream which enters the control device, including flow and VOC content under varying liquid level conditions (dynamic and static) and manufacturer's design specifications for the control device. If the control device or the closed vent capture system receives vapors, gases, or liquids other than fuels from sources that are not designated sources under 40 CFR Part 60 subpart K, the efficiency demonstration is to include consideration of all vapors, gases, and liquids received by the closed vent capture system and control device. If an enclosed combustion device with a minimum residence time of 0.75 seconds and a minimum temperature of 816 °C is used to meet the 95 percent requirement, documentation that those conditions will exist is sufficient to meet the requirements of this paragraph.
    - ii. A description of the parameter or parameters to be monitored to ensure that the control device will be operated in conformance with its design and an explanation of the criteria used for selection of that parameter

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2. Operate the closed vent system and control device and monitor the parameters of the closed vent system and control device in accordance with the operating plan submitted to the Administrator in accordance with paragraph c.1. of this section, unless the plan was modified by the Administrator during the review process. In this case, the modified plan applies.
- d. The owner or operator of each source that is equipped with a closed vent system and a flare to meet the requirements in § 60.112b (a)(3) or (b)(2) shall meet the requirements as specified in the general control device requirements, § 60.18 (e) and (f).

[40 CFR § 60.113b and 45CSR§16-2.1]

### 7.3. Recordkeeping Requirements

- 7.3.1. To determine compliance with the throughput limits set forth in Section 7.1.1. and the VOC emission limit set forth in Section 7.1.2., the permittee shall keep monthly records of throughput of each raw material/product for each tank. These records shall be kept individually, i.e. per tank. AP-42 emission factors for organic liquid storage tanks (Supp. D, Chapter 7.1), may be used to estimate yearly emissions.
- 7.3.2. To determine compliance with the short-term and annual HAP emission limits set forth in Sections 7.1.2., the permittee shall estimate the emissions using a material balances calculation utilizing the vapor weight of HAPs present in petroleum liquids processed and transported at the facility. The following equation shall be to determine monthly and yearly emissions.

$$\text{HAP Emissions (tpm or tpy)} = \frac{[(\text{Individual HAP } \%) \times (\text{Actual VOC emissions, obtained from section 7.4.1. (tpm or tpy)})]}{100}$$

Compliance with the yearly limit shall be based on a 12-month rolling total in accordance with Section 2.1.4.

- 7.3.3. The following 40 CFR 60 Subpart K requirements apply to Tanks ~~4036, 4037, 4038, and 4039~~;

Except as provided in 40 CFR § 60.113(d), the owner or operator subject to 40 CFR Part 60 subpart K shall maintain a record of the petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period.

[40 CFR § 60.112(a) and 45CSR§16-2.1]

- 7.3.4. The following 40 CFR 60 Subpart Kb requirements apply to Tanks ~~4000, 4004, 4005, 4006, 4034, 4047, 4048, 4050, 4051, 4054, 4055, 4056, 4057, 4060, 4061, 4062, 4063, 4070, and 4071~~;

*Based on storage of heavy products, the following tanks are not subject to either the floating roof requirements or the closed vent system and control requirements of 40 CFR 60 Subpart Kb: 4034, 4047, 4048, 4051, 4054, 4055, 4056, 4057.*

The owner or operator of each storage vessel as specified in 40 CFR § 60.112b (a) shall keep records and furnish reports as required by 40 CFR § 60.115b (a), (b), or (c) depending upon the control equipment installed to meet the requirements of 40 CFR § 60.112b. The owner or operator shall keep copies of all reports and records required by this section, except for the record required by 40 CFR § 60.115b (c) (1), for at least 2 years. The record required by 40 CFR § 60.115b (c)(1) will be kept for the life of the control equipment.

- a. After installing control equipment in accordance with 40 CFR § 60.112b (a) (1) (fixed roof and internal floating roof), the owner or operator shall meet the following requirements.

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1. Furnish the Administrator with a report that describes the control equipment and certifies that the control equipment meets the specifications of 40 CFR § 60.112b (a)(1) and 40 CFR § 60.113b (a)(1). This report shall be an attachment to the notification required by 40 CFR § 60.7 (a)(3).
  2. Keep a record of each inspection performed as required by 40 CFR §§ 60.113b (a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
  3. If any of the conditions described in 40 CFR § 60.113b (a)(2) are detected during the annual visual inspection required by 40 CFR § 60.113b (a)(2), a report shall be furnished to the Administrator within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
  4. After each inspection required by 40 CFR § 60.113b (a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR § 60.113b (a)(3)(ii), a report shall be furnished to the Administrator within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR § 60.112b (a)(1) or 40 CFR § 60.113b (a)(3) and list each repair made.
- b. After installing control equipment in accordance with 40 CFR § 60.112b (a)(2) (external floating roof), the owner or operator shall meet the following requirements.
1. Furnish the Administrator with a report that describes the control equipment and certifies that the control equipment meets the specifications of 40 CFR § 60.112b (a)(2) and 40 CFR § 60.113b (b)(2), (b)(3), and (b)(4). This report shall be an attachment to the notification required by 40 CFR § 60.7(a)(3).
  2. Within 60 days of performing the seal gap measurements required by 40 CFR § 60.113b (b)(1), furnish the Administrator with a report that contains:
    - i. The date of measurement.
    - ii. The raw data obtained in the measurement.
    - iii. The calculations described in 40 CFR §§ 60.113b (b)(2) and (b)(3).
  3. Keep a record of each gap measurement performed as required by 40 CFR § 60.113b (b). Each record shall identify the storage vessel in which the measurement was performed and shall contain:
    - i. The date of measurement.
    - ii. The raw data obtained in the measurement.
    - iii. The calculations described in 40 CFR §§ 60.113b (b)(2) and (b)(3).
  4. After each seal gap measurement that detects gaps exceeding the limitations specified by 40 CFR § 60.113b (b)(4), submit a report to the Administrator within 30 days of the inspection. The report will identify the vessel and contain the information specified in 40 CFR § 60.115b (b)(2) and the date the vessel was emptied or the repairs made and date of repair.
- c. After installing control equipment in accordance with 40 CFR §§ 60.112b (a)(3) or (b)(1) (closed vent system and control device other than a flare), the owner or operator shall keep the following records.

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1. A copy of the operating plan.
  2. A record of the measured values of the parameters monitored in accordance with 40 CFR § 60.113b(c)(2).
- d. After installing a closed vent system and flare to comply with 40 CFR § 60.112b, the owner or operator shall meet the following requirements.
1. A report containing the measurements required by 40 CFR §§ 60.18 (f)(1), (2), (3), (4), (5), and (6) shall be furnished to the Administrator as required by 40 C.F.R. § 60.8 of the General Provisions. This report shall be submitted within 6 months of the initial start-up date.
  2. Records shall be kept of all periods of operation during which the flare pilot flame is absent.
  3. Semiannual reports of all periods recorded under 40 CFR § 60.115b (d)(2) in which the pilot flame was absent shall be furnished to the Administrator.
- [40 CFR § 60.115b, 45CSR§16-2.1]

7.3.5. The following 40 CFR 60 Subpart Kb requirements apply to ~~Tanks 4000, 4004, 4005, 4006, 4034, 4047, 4048, 4050, 4051, 4054, 4055, 4056, 4057, 4060, 4061, 4062, 4063, 4070, and 4071:~~

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- a. The owner or operator shall keep copies of all records required by 40 CFR Part 60 Subpart Kb, except for the record required by paragraph (b) of this section, for at least 2 years. The record required by paragraph (b) of this section will be kept for the life of the source.
- b. The owner or operator of each storage vessel as specified in 40 CFR § 60.110b (a) shall keep readily accessible records showing the dimension and an analysis showing the capacity of the storage vessel.
- c. Except as provided in paragraphs (f) and (g) of this section, the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa or with a design capacity greater than or equal to 75 m<sup>3</sup> but less than 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure greater than or equal to 15.0 kPa shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.
- d. Except as provided in paragraph (g) of this section, the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa or with a design capacity greater than or equal to 75 m<sup>3</sup> but less than 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure that is normally less than 27.6 kPa shall notify the Administrator within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range.
- e. Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below.
  1. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
  2. For crude oil or refined petroleum products the vapor pressure may be obtained by the following:
    - i. Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API

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Bulletin 2517 (incorporated by reference -- see § 60.17), unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).

ii. The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.

- f. The owner or operator of each vessel storing a waste mixture of indeterminate or variable composition shall be subject to the following requirements.
1. Prior to the initial filling of the vessel, the highest maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in paragraph (e) of this section.
  2. For vessels in which the vapor pressure of the anticipated liquid composition is above the cutoff for monitoring but below the cutoff for controls as defined in 40 CFR §60.112b(a), an initial physical test of the vapor pressure is required; and a physical test at least once every 6 months thereafter is required as determined by the following methods:
    - i. ASTM D2879-83, 96, or 97 (incorporated by reference -- see 40 CFR § 60.17); or
    - ii. ASTM D323-82 or 94 (incorporated by reference -- see 40 CFR § 60.17); or
    - iii. As measured by an appropriate method as approved by the Administrator.
- g. The owner or operator of each vessel equipped with a closed vent system and control device meeting the specification of 40 CFR § 60.112b or with emissions reductions equipment as specified in 40 CFR § 65.42(b)(4), (b)(5), (b)(6), or (c) is exempt from the requirements of paragraphs (c) and (d) of this section. **[40 CFR § 60.116b, 45CSR§16-2.1]**

#### 7.4. Reporting Requirements

7.5.1. None.

#### 7.5. Compliance Plan

7.6.1. None.