

**Synthetic Minor Determination and/or**  **Netting Determination**

Permit To Install **14-05197**

**A. Source Description**

The TEPPCO Todhunter facility is a storage site for liquified petroleum gas and jet fuel for Texas Eastern Products Pipeline Company. The North Flare and Rack Flare are used for maintenance and repair of the liquid petroleum gas pipeline. During periods of maintenance, the pipeline is shut down and the residual gas is burned off in either of the flares. The emissions from these emissions units were previously de minimus but now due to increased use they need to have permits.

**B. Facility Emissions and Attainment Status**

Currently, the facility has minimal emissions of volatile organic compounds (VOCs). The facility has been limited to 0.57 tons per year VOCs for the active status emissions unit P007. The TEPPCO Todhunter facility is located in Butler County which is a non-attainment area for organic compounds and attainment for all other criteria pollutants.

**C. Source Emissions**

The proposed emissions units identified in PTI 14-05197 each have a maximum potential to emit of 14.5 pounds per hour and 63.5 tons per year for VOCs. The proposed emissions units also have a maximum potential to emit of 38.3 pounds per hour and 167.8 tons per year for carbon monoxide (CO). The maximum potential to emit for the proposed emissions units has been based on a maximum operating schedule of 8760 hours per year. Both flares have a combined potential to emit for VOC and CO of 127.0 tons per year and 335.6 tons per year respectively. The major source threshold for volatile organic compound emissions is 100 tons per year and 250 tons per year for CO emissions. Each emissions units will be limited to 400 hours per year of operation, which will limit the VOC emissions to 5.8 TPY and the CO emissions to 15.4 TPY.

**D. Conclusion**

A synthetic minor PTI is recommended for the above referenced emissions units at the TEPPCO Todhunter Facility, so that the facility may avoid the requirements of Title V, PSD and Emissions Offset Policy. The allowable emissions will be limited based on a maximum operating schedule of 400 hours per year for each of the flares. The permittee will maintain hours of operation records and submit quarterly deviation reports to demonstrate compliance with the permit limits. Since the emissions are less than the major source thresholds, PSD, Title V and the Emissions Offset Policy will not apply to these emissions units.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL  
BUTLER COUNTY**

**CERTIFIED MAIL**

**Application No: 14-05197**

**DATE: 5/14/2002**

TEPPCO Todhunter Terminal  
Chandra Sripadam  
PO Box 2521  
Houston, TX 77252-2521

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

HCDES

Ohio-Kentucky-Indiana Reg Coun of Gov

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**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 14-05197**

Application Number: 14-05197  
APS Premise Number: 1409000264  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: TEPPCO Todhunter Terminal  
Person to Contact: Chandra Sripadam  
Address: PO Box 2521  
Houston, TX 772522521

Location of proposed air contaminant source(s) [emissions unit(s)]:

**3950 Yankee Road  
Middletown, Ohio**

Description of proposed emissions unit(s):

**Flare to be used for burning LPGs during maintenance and repair of LPG equipment.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

**Part I - GENERAL TERMS AND CONDITIONS**

**A. Permit to Install General Terms and Conditions**

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

#### 14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

#### 15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

### B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	5.8
CO	15.4
NOx	2.8
PM/PM10	0.48

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Emissions Unit ID: **P013**

Issued: To be entered upon final issuance

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P013 - LPG north flare used for repair and maintenance of LPG equipment	OAC rule 3745-31-05 (A)(3)	14.5 lbs/hr VOC 38.3 lbs/hr CO 7.0 lbs/hr NOx 1.2 lbs/hr PM/PM10
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-31-05(D).
	OAC rule 3745-31-05 (D)	2.9 TPY VOC* 7.7 TPY CO* 1.4 TPY NOx* 0.24 TPY PM/PM10* See Term B.1
	OAC rule 3745-17-07(A)(1)	See term A.2.c
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(J)(2)	

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

\* Based on a rolling, 12-month summation.

## 2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a smokeless flare and compliance with the annual operating hours limitation.
- 2.b The hourly emission limitations outlined in section A.I.1. are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c Visible particulate emissions from this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

## B. Operational Restrictions

- 1. The maximum annual operating hours for emissions unit P013 shall not exceed 400 hours per year, based on a rolling, 12-month summation of the operating hours. The permittee has existing records to demonstrate compliance with this limit upon issuance of this permit.
- 2. No person shall emit organic materials into the atmosphere from a waste gas flare system unless such materials are burned by smokeless flares, or an equally effective control equipment as approved by the director.

## C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain monthly records of the following information for emissions unit P014:
  - a. The operating hours for each month.
  - b. The rolling, 12-month summation of the operating hours.

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Emissions Unit ID: P013

Issued: To be entered upon final issuance

#### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify any exceedances of the rolling, 12-month operating hours limitation, as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period, the permittee shall state so in the report.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

#### E. Testing Requirements

1. Emissions Limits

38.3 lbs/hr CO, 7.7 TPY CO

Compliance with the CO emissions limits shall be demonstrated by the following calculations using the emission factor in AP-42 Fifth Edition, Industrial Flares, Table 13.5-1, 1995 and, for the annual emissions, the actual annual operating hours:

$[\text{actual LPG heat input to flare (MMBtu/hr)} + \text{actual pilot gas heat input to flare (MMBtu/hr)}] \times \text{CO emission factor (0.37 lb CO/MMBtu)} = \text{lb/hr CO};$

$\text{average actual CO emissions (lb/hr)} \times \text{actual flare operating hours (hr/year)} \times \text{Ton/2000 lbs} = \text{TPY CO}$

2. Emissions Limits

14.5 lbs/hr VOC, 2.9 TPY VOC

Compliance with the VOC emissions limits shall be demonstrated by the following calculations using the emission factor in AP-42 Fifth Edition, Industrial Flares, Table 13.5-1, 1995 and, for the annual emissions, the actual annual operating hours:

$[\text{actual LPG heat input to flare (MMBtu/hr)} + \text{actual pilot gas heat input to flare (MMBtu/hr)}] \times \text{VOC emission factor (0.14 lb VOC/MMBtu)} = \text{lb/hr VOC};$

$\text{average actual VOC emissions (lb/hr)} \times \text{actual flare operating hours (hr/year)} \times \text{Ton/2000 lbs} = \text{TPY VOC}$

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Issued: To be entered upon final issuance

Emissions Unit ID: P013

3. Emissions Limits

7.0 lbs/hr NO<sub>x</sub>, 1.4 TPY NO<sub>x</sub>

Compliance with the NO<sub>x</sub> emissions limits shall be demonstrated by the following calculations using the emission factor in AP-42 Fifth Edition, Industrial Flares, Table 13.5-1, 1995 and, for the annual emissions, the actual annual operating hours:

$$[\text{actual LPG heat input to flare (MMBtu/hr)} + \text{actual pilot gas heat input to flare (MMBtu/hr)}] \times \text{NO}_x \text{ emission factor (0.068 lb NO}_x\text{/MMBtu)} = \text{lb/hr NO}_x;$$

$$\text{average actual NO}_x \text{ emissions (lb/hr)} \times \text{actual flare operating hours (hr/year)} \times \text{Ton/2000 lbs} = \text{TPY NO}_x$$

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Issued: To be entered upon final issuance

Emissions Unit ID: P013

4. Emissions Limits

1.2 lbs/hr PM/PM10, 0.24 TPY PM/PM10

Compliance with the PM/PM10 emissions limits shall be demonstrated by the following calculations and for the annual emissions, the actual annual operating hours:

$[0.07 \text{ grains PM/PM10/cubic feet}] \times 2000 \text{ cubic feet/minute} \times 1.0 \text{ lb/7000 grains} \times 60 \text{ min/hr} =$   
lb/hr PM/PM10;

average actual PM/PM10 emissions (lb/hr) x actual flare operating hours (hr/year) x Ton/2000 lbs  
= TPY PM/Pm10

5. Compliance with the annual operating hours limitation in term B.1 shall be demonstrated by the recordkeeping requirement in term C.1.

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A., B., C., D. and E.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P014 - LPG rack flare used for truck loading and repair and maintenance of LPG equipment	OAC rule 3745-31-05 (A)(3)	14.5 lbs/hr VOC 38.3 lbs/hr CO 7.0 lbs/hr NOx 1.2 lbs/hr PM/PM10
	OAC rule 3745-31-05 (D)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-31-05(D).
	OAC rule 3745-17-07(A)(1)	2.9 TPY VOC* 7.7 TPY CO* 1.4 TPY NOx* 0.24 TPY PM/PM10* See Term B.1
	OAC rule 3745-21-07(J)(2)	See term A.2.c
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
		The emission limitation specified by

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PTI ]

Emissions Unit ID: **P014**

**Issued: To be entered upon final issuance**

this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

\* Based on a rolling, 12-month summation.

**2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a smokeless flare and compliance with the annual operating hours limitation.
- 2.b** The hourly emission limitations outlined in section A.I.1. are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** Visible particulate emissions from this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

**B. Operational Restrictions**

- 1. The maximum annual operating hours for emissions unit P014 shall not exceed 400 hours per year, based on a rolling, 12-month summation of the operating hours. The permittee has existing records to demonstrate compliance with this limit upon issuance of this permit.
- 2. No person shall emit organic materials into the atmosphere from a waste gas flare system unless such materials are burned by smokeless flares, or an equally effective control equipment as approved by the director.

**C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall maintain monthly records of the following information for emissions unit P014:
  - A. The operating hours for each month.
  - B. The rolling, 12-month summation of the operating hours.

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Emissions Unit ID: P014

Issued: To be entered upon final issuance

#### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify any exceedances of the rolling, 12-month operating hours limitation, as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period, the permittee shall state so in the report.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

#### E. Testing Requirements

1. Emissions Limits

38.3 lbs/hr CO, 7.7 TPY CO

Compliance with the CO emissions limits shall be demonstrated by the following calculations using the emission factor in AP-42 Fifth Edition, Industrial Flares, Table 13.5-1, 1995 and, for the annual emissions, the actual annual operating hours:

$[\text{actual LPG heat input to flare (MMBtu/hr)} + \text{actual pilot gas heat input to flare (MMBtu/hr)}] \times \text{CO emission factor (0.37 lb CO/MMBtu)} = \text{lb/hr CO};$

$\text{average actual CO emissions (lb/hr)} \times \text{actual flare operating hours (hr/year)} \times \text{Ton/2000 lbs} = \text{TPY CO}$

2. Emissions Limits

14.5 lbs/hr VOC, 2.9 TPY VOC

Compliance with the VOC emissions limits shall be demonstrated by the following calculations using the emission factor in AP-42 Fifth Edition, Industrial Flares, Table 13.5-1, 1995 and, for the annual emissions, the actual annual operating hours:

$[\text{actual LPG heat input to flare (MMBtu/hr)} + \text{actual pilot gas heat input to flare (MMBtu/hr)}] \times \text{VOC emission factor (0.14 lb VOC/MMBtu)} = \text{lb/hr VOC};$

$\text{average actual VOC emissions (lb/hr)} \times \text{actual flare operating hours (hr/year)} \times \text{Ton/2000 lbs} = \text{TPY VOC}$

3. Emissions Limits

7.0 lbs/hr NO<sub>x</sub>, 1.4 TPY NO<sub>x</sub>

Compliance with the NO<sub>x</sub> emissions limits shall be demonstrated by the following calculations using the emission factor in AP-42 Fifth Edition, Industrial Flares, Table 13.5-1, 1995 and, for the annual emissions, the actual annual operating hours:

$[\text{actual LPG heat input to flare (MMBtu/hr)} + \text{actual pilot gas heat input to flare (MMBtu/hr)}] \times \text{NO}_x \text{ emission factor (0.068 lb NO}_x\text{/MMBtu)} = \text{lb/hr NO}_x$ ;

$\text{average actual NO}_x \text{ emissions (lb/hr)} \times \text{actual flare operating hours (hr/year)} \times \text{Ton/2000 lbs} = \text{TPY NO}_x$

4. Emissions Limits

1.2 lbs/hr PM/PM<sub>10</sub>, 0.24 TPY PM/PM<sub>10</sub>

Compliance with the PM/PM<sub>10</sub> emissions limits shall be demonstrated by the following calculations and for the annual emissions, the actual annual operating hours:

$[0.07 \text{ grains PM/PM}_{10}\text{/cubic feet}] \times 2000 \text{ cubic feet/minute} \times 1.0 \text{ lb/7000 grains} \times 60 \text{ min/hr} = \text{lb/hr PM/PM}_{10}$ ;

$\text{average actual PM/PM}_{10} \text{ emissions (lb/hr)} \times \text{actual flare operating hours (hr/year)} \times \text{Ton/2000 lbs} = \text{TPY PM/Pm}_{10}$

4. Compliance with the annual operating hours limitation in term B.1 shall be demonstrated by the recordkeeping requirement in term C.1.

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A., B., C., D. and E.

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05197

Facility ID: 1409000264

FACILITY NAME TEPPCO Todhunter Terminal

FACILITY DESCRIPTION Flare to be used for burning LPGs during CITY/TWP Middletown

Emissions Unit ID: **P014**

SIC CODE 4613

SCC CODE 3-06-009-03

EMISSIONS UNIT ID P013

EMISSIONS UNIT DESCRIPTION LPG north flare used for repair and maintenance of LPG equipment

DATE INSTALLED 1970

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	1.2 lbs/hr	0.24	1.2 lbs/hr	0.24
PM <sub>10</sub>	Attainment	1.2 lbs/hr	0.24	1.2 lbs/hr	0.24
Sulfur Dioxide					
Organic Compounds	Non-attainment	14.5	2.9	14.5	2.9
Nitrogen Oxides	Attainment	7.03	1.4	7.0	1.4
Carbon Monoxide	Attainment	38.3	7.7	38.3	7.7
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

BAT requires that compliance be demonstrated by the use of a smokeless flare and compliance with the annual operating hours limitation.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

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**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*?

YES

X NO

IDENTIFY THE AIR CONTAMINANTS:

NA

**18 NEW SOURCE REVIEW FORM B**

PTI Number: 14-05197 Facility ID: 1409000264

FACILITY NAME TEPPCO Todhunter Terminal

FACILITY DESCRIPTION Flare to be used for burning LPGs during CITY/TWP Middletown

Emissions Unit ID: **P014**

SIC CODE 4613 SCC CODE 3-06-009-03 EMISSIONS UNIT ID P014

EMISSIONS UNIT DESCRIPTION LPG rack flare used for truck loading and repair and maintenance of LPG equipment

DATE INSTALLED 1970

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	1.2 lbs/hr	0.24	1.2 lbs/hr	0.24
PM <sub>10</sub>	Attainment	1.2 lbs/hr	0.24	1.2 lbs/hr	0.24
Sulfur Dioxide					
Organic Compounds	Non-attainment	14.5	2.9	14.5	2.9
Nitrogen Oxides	Attainment	7.03	1.4	7.0	1.4
Carbon Monoxide	Attainment	38.3	7.7	38.3	7.7
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

BAT requires that compliance be demonstrated by the use of a smokeless flare and compliance with the annual operating hours limitation.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$-

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*?                      YES X NO

IDENTIFY THE AIR CONTAMINANTS: NA