

Facility Name: **Products SE Pipeline Corporation – Bremen Tank Farm**
 City: Bremen
 County: Haralson
 AIRS #: 04-13-143-00017

Application #: TV- 834001
 Date Application Received: May 20, 2024
 Permit No: 4613-143-0017-V-05-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name: Products SE Pipeline Corporation – Bremen Tank Farm

2. Parent/Holding Company Name

Products (SE) Pipe Line Corporation

3. Previous and/or Other Name(s)

Plantation Pipeline Company – Bremen Tank Farm

4. Facility Location

3000 Miller Academy Road, Bremen, Georgia 30110 (Haralson County)

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in an attainment area for all pollutants.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
4613-143-0017-V-04-0	November 27, 2019	Title V Permit Renewal
4613-143-0017-V-04-1	March 15, 2021	Administrative permit Amendment (Facility Name Change)
4613-143-0017-V-04-2	January 19, 2024	Minor Modification without Construction (Remove major source MACT conditions from permit.)

D. Process Description

1. SIC Codes(s)

4613 – Refined Petroleum Pipelines

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The Bremen Tank Farm is a gasoline pipe line breakout station

3. Overall Facility Process Description

The Bremen Tank Farm emission sources consist of 29 main regulated storage tanks, 1 contamination gasoline storage tank and a water treatment storage tank. The Bremen Tank Farm is a pipeline breakout station with a total storage capacity of approximately 1.3 million barrels of gasoline products. The terminal receives petroleum products by pipeline and ships out product by pipeline to gasoline terminals. Volatile organic compounds (VOCs) emissions result primarily from storage tank losses and from fugitive sources, such as flanges, valves and pump seals. Product SE Pipe Line's operating schedule is 24 hours per day, 7 days per week, 52 weeks per year

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

Total tank storage at this facility is approximately 1.3 million barrels. PSD regulations name petroleum storage facilities with total capacities of greater than 300,000 barrels as one of the 28 named categories of sources whose annual emissions make them a PSD major source if they exceed 100 tons. Potential emissions of volatile organic compounds (VOC) are 264 tons per year; therefore, Bremen Tank Farm would be considered a major source for PSD purposes. This facility is located in Haralson County, which is outside of the metro Atlanta ozone non-attainment area. Therefore, the NAA NSR regulations would not be applicable.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility’s Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	n/a			
PM ₁₀	n/a			
PM _{2.5}	n/a			
SO ₂	n/a			
VOC	Yes	✓		
NO _x	n/a			
CO	n/a			
TRS	n/a			
H ₂ S	n/a			
Individual HAP	Yes			✓
Total HAPs	Yes			✓

3. MACT Standards

The Bremen Tank Farm is a minor source of individual and total HAPs and is not subject to any major source MACT. As an area source the facility is subject to all applicable requirements of the area source MACT 40 CFR 63 Subpart BBBBBB.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

The facility is a minor source individual and total HAPs and is not subject to any major source MACT such as 40 CFR 63 Subpart R and 40 CFR 63 Subpart GGGGG. The facility is subject to area source MACT 40 CFR 63 Subpart BBBB and 40 CFR 63 Subpart WW. 40 CFR 63 Subpart WW allows for compliance via compliance with 40 CFR 60 Subpart Kb and 40 CFR 63 Subpart BBBB.

C. Compliance Status

The facility appears to be in compliance with all applicable rules and regulations.

D. Permit Conditions

Condition 2.2.1 establishes the applicability of Subpart A - “General Provisions” of 40 CFR 60 – “Standards of Performance for New Stationary Sources”.

Condition 2.2.2 states that the facility is subject to all applicable provisions of for the area source MACT 40 CFR 63 Subpart A (General Provisions) and has the citation from 40 CFR 63 Subpart BBBB.

Condition 2.2.3 requires the Permittee to comply with all applicable requirements of the area source MACT 40 CFR 63 Subpart BBBB for equipment or storage tanks in gasoline service.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices
ID No.	Description		Description
GR02	T034, T035, T036, T038, T039, T040, T041, T042, T043, T065, T066, T067, T068, T080, T081, T082	391-3-1-.02(2)(nn) 40 CFR 63 Subpart A 40 CFR 63 Subpart BBBBBB	External Floating Roof Tanks
GR03	T127, TCT1, TCT2, TCT3	391-3-1-.02(2)(bb) 40 CFR 60 Subpart A 40 CFR 60 Subpart Kb 40 CFR 63 Subpart A 40 CFR 63 Subpart BBBBBB	Internal Floating Roof Tanks
GR04	T176, T177	391-3-1-.02(2)(bb) 40 CFR 60 Subpart A 40 CFR 60 Subpart Kb 40 CFR 63 Subpart A 40 CFR 63 Subpart BBBBBB	Internal Floating Roof Tanks
WAT1	Petroleum Contact Water Accumulation Tank	391-3-1-.02(2)(bb) 40 CFR 60 Subpart A 40 CFR 60 Subpart K 40 CFR 63 Subpart A 40 CFR 63 Subpart BBBBBB	Fixed Roof Storage Tank
GR01	T030, T032, T037, T063, T064, T075, T076, T077, T078, T079	40 CFR 63 Subpart A 40 CFR 63 Subpart BBBBBB	Vertical Fixed roofs – Tanks store Jet Fuel/ Kerosene Products

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

B. Equipment & Rule Applicability

Emission and Operating Caps: Not applicable.

Rules and Regulations Assessment:

Rules and Regulations Assessment: No major source MACTs including 40 CFR 63 Subpart R and 40 CFR 63 Subpart GGGGG apply to the facility. The area source GACT 40 CFR 63 Subpart BBBBBB applies to the facility. Option 2(d) of Table 1 of 40 CFR 63 Subpart BBBBBB allows the facility to comply with either 40 CFR 60 Subpart Kb or 40 CFR 63 Subpart WW and to switch between these two rules via notification of compliance status (NOCS) provision of 40 CFR 63 Subpart BBBBBB. This provides added flexibility to the facility’s operations. The permit provides for compliance with the requirements of 40 CFR 63 Subpart WW instead of 40 CFR 60 Subpart Kb and to switch between these two rules without a permit amendment.

Georgia Rule (bb) - “Petroleum Liquid Storage,” applies to tanks T127, TCT1, TCT2, TCT3, T176 and T177, since each of these tanks has a capacity of more than 40,000 gallons and is used to store a product with a vapor pressure of greater than 1.52 psia.

These are fixed roof vessels, which are equipped with internal floating roofs. Tanks that have external floating roofs, are not subject to Rule (bb), since they do not have fixed roofs.

Georgia Rule (nn) - “VOC Emissions from External Floating Roof Tanks,” applies to storage tanks with storage capacities of greater than 40,000 gallons that are equipped with external floating roofs. Tanks T034, T035, T036, T038, T039, T040, T041, T042, T043, T065, T066, T067, T068, T080, T081 and T082 meet these criteria and must therefore, have secondary seals on their roofs.

40 CFR 60 Subpart K is a federal standard of performance for petroleum storage vessels constructed after June 11, 1973 and prior to May 19, 1978, that have storage capacities of greater than 40,000 gallons. Tank WAT1 meets these criteria and has been equipped with a fixed roof. This tank is currently being used as a water accumulation tank.

40 CFR 60 Subpart Kb is a federal standard of performance for petroleum storage vessels constructed after July 23, 1984 that have storage capacities of greater than 75 cubic meters (about 19,800 gallons). The tanks T176, T177, T127, TCT1, TCT2, and TCT3 meet these criteria.

40 CFR 60 Subpart IIII is a federal standard of performance for stationary compression ignition internal combustion engines. This regulation applies to manufacturers, owners and operators of stationary compression ignition (CI) internal combustion engines (ICE) that commenced construction after July 11, 2005 and were manufactured after April 1, 2006. Subpart IIII specifies emission standards, fuel standards, and operating and maintenance requirements for the diesel engines. The emergency fire pump FP01 and air compressor COMP1 (both included in the appendix as insignificant activities) are subject to this rule and demonstrate compliance with Permit Condition 8.27.1.

C. Permit Conditions

Condition 3.3.1 establishes applicability of 40 CFR 60 Subpart K.

Condition 3.3.2 establishes applicability of 40 CFR 60 Subpart Kb and has citation from 40 CFR 63 Subpart 6B.

Condition 3.3.3 has the requirements from 40 CFR 63 Subpart 6B for storage tanks with capacities less than 19,812 gallons.

Condition 3.3.4 specifies Option 2(d) in Table 1 of 40 CFR 63 Subpart BBBB which allows the tanks to comply with either 40 CFR 60 Subpart Kb or 40 CFR 63 Subpart WW and switch between these two rules.

Condition 3.4.1 is a State only enforceable condition requiring the facility to use paint of a heat-reflective nature when repainting tanks.

Condition 3.4.2 establishes applicability of Georgia Rule (bb).

Condition 3.4.3 establishes applicability of Georgia Rule (nn).

IV. Testing Requirements (with Associated Record Keeping and Reporting)**A. General Testing Requirements**

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

Condition 4.1.3.c lists Reid Vapor Pressure test methods.

B. Specific Testing Requirements

Not applicable.

V. Monitoring Requirements**A. General Monitoring Requirements**

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Condition 5.2.1 requires the facility to determine and maintain the records of tanks in accordance with 40 CFR Subpart Kb

Existing 40 CFR 63 Subpart R conditions 5.2.2 and 5.2.3 are not included in the renewal permit since this major source MACT does not apply to the facility and the facility complies with 40 CFR 63 Subpart BBBBBB. Subsequent conditions in this section have been renumbered in the renewal permit.

Conditions 5.2.2 to 5.2.11 has citation from 40 CFR 63 Subpart BBBBBB and has 40 CFR 60 Subpart Kb requirements including conducting monthly leak inspections, recording the information required for leaks detected, measures taken to prevent vapor release, tank inspections, and reporting and notifications.

Condition 5.2.3 has citation for 40 CFR 63 Subpart WW in addition to 40 CFR 60 Subpart Kb citation.

Condition 5.2.4 in the current permit has been included in the draft renewal permit since 40 CFR 63.11086(d)(1)-(4) has been renumbered as 40 CFR 63.11086(b)(1)-(4) in the April 8, 2024 update to 40 CFR 63 Subpart BBBBBB.

Conditions 5.2.10 through 5.2.10 contain requirements of 40 CFR 63 Subpart BBBBBB.

Conditions 5.2.12 and 5.2.13 are 40 CFR 63 Subpart WW conditions.

C. Compliance Assurance Monitoring (CAM)

Not Applicable

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Condition 6.1.7.a requires excess emission reports for any each occurrence of an equipment leak detected during the inspections required by Condition 5.2.8, for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detection per the requirements of 40 CFR 63 Subpart BBBBBB.

Condition 6.1.7.c. requires reporting of each inspection not performed, each notification, records or reports not made/kept per the requirements of 40 CFR 60 Subpart BBBBBB.

Conditions 6.2.1 and 6.2.2 in the renewal permit are the inspection recordkeeping requirement of 40 CFR 63 Subpart BBBBBB. These were Conditions 6.2.3 and 6.2.4 in the current permit.

Condition 6.2.3 is the recordkeeping requirement for equipment in gasoline service per 40 CFR 63 Subpart BBBBBB. This is Condition 6.2.5 in the current permit.

Condition 6.2.4 is the recordkeeping requirements for leaks detected per Condition 5.2.9 per 40 CFR 63 Subpart BBBBBB. This is Condition 6.2.6 in the current permit.

Condition 6.2.5 is required by 40 CFR 63 Subpart WW and 40 CFR 60 Subpart Kb. This is Condition 6.2.17 in the current permit.

Condition 6.2.6 requires the Permittee to notify the Division within 30 days of any compliance option change by submission of an updated Notice of Compliance Status (NOCS) per the requirements of Option 2d in Table 1 of 40 CFR 63 Subpart BBBBBB. This is Condition 6.2.18 in the current permit.

VII. Specific Requirements

A. Operational Flexibility

Not applicable

B. Alternative Requirements

Not applicable

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources

Not applicable

E. Short-Term Activities

Not applicable

F. Compliance Schedule/Progress Reports

Not applicable

G. Emissions Trading

Not applicable

H. Acid Rain Requirements

Not applicable

I. Stratospheric Ozone Protection Requirements

The facility is not subject to Title VI requirements

J. Pollution Prevention

Not applicable

K. Specific Conditions

Not applicable

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//