



Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	09/24/2024	
Media Program:	Air	
Regulatory Program(s)	SIP, Title V, NSPS, NESHAP, MACT	
Company Name:	Vopak Industrial Infrastructure Americas St. Charles, LLC	
Facility Name:	Vopak Terminal St. Charles	
Facility Physical Location:	335 LA Hwy 3142	
(city, state, zip code)	Hahnville, LA 70057	
Mailing address:	2000 W Loop S Ste 1040	
(city, state, zip code)	Houston, TX 77027	
County/Parish:	St. Charles	
Facility Phone Number	(281) 832-9274	
Facility Contact:	Kelly Phillips	Environmental Engineer
	Kelly.Phillips@vopak.com	
FRS Number:	110071062771	
Identification/Permit Number:	AI # 227637 / Permit: 2520-00186-V1	
Media Identifier Number:	AFS # 2208900186	
NAICS:	493190 – Other Warehousing and Storage	
SIC:	4226 – Special Warehousing and Storage, Not Elsewhere Classified	
Personnel participating in inspection:		
Sophia Ong	EPA Region 6, ECADAT	Physical Scientist
Constantinos Loukeris	EPA Region 5, AECAB	Environmental Engineer
Kara Allen	EPA Region 6, ECADAT	Life Scientist
Colleen McCarthy	EPA Region 6, ECADAT	Life Scientist
Benjamin Rosenthal	EPA Region 6, ECADAT	Physical Scientist
Victoria Nelson	EPA Region 5, AECAB	Environmental Engineer
Karina Kuc	EPA Region 5, AECAB	Environmental Engineer
John Penland	EPA Region 6, ECADWSTEB	Senior Environmental Scientist
Nathan Ward	LDEQ	Environmental Scientist
Darren Duhe	Vopak	Safety Health Specialist
Kelly Phillips	Vopak	Environmental Engineer
Armando Evangelisa	Vopak	Dock Technician/Operator
Charles Patterson	Vopak	Shift Supervisor
Dennis Fleming	Think Environmental	Site Supervisor
EPA Lead Inspector Signature/Date	SOPHIA ONG Digitally signed by SOPHIA ONG Date: 2024.12.23 14:28:12 -06'00'	
	Sophia Ong	Date
Supervisor Signature/Date	JAMES LEATHERS Digitally signed by JAMES LEATHERS Date: 2024.12.23 15:04:46 -06'00'	
	James Leathers	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Sophia Ong (“I”), Colleen McCarthy, Ben Rosenthal, Kara Allen, and John Penland and EPA Region 5 inspectors Constantinos Loukeris, Victoria Nelson, and Karina Kuc (“EPA inspectors”) met with Vopak Industrial Infrastructure Americas St. Charles, LLC (“Vopak” or the “Facility”) at 1:30 pm on September 24, 2024, for an unannounced inspection. We were accompanied by Nathan Ward from the Louisiana Department of Environmental Quality (“LDEQ”). We met with Vopak representatives Darren Duhe, Safety Health Specialist, and Kelly Phillips, Environmental Engineer, in Union Carbide Corporation’s (“Union Carbide”) conference room for the opening conference. Constantinos Loukeris presented his credentials to Ms. Phillips, and we informed them that this was an EPA inspection to determine compliance with the facility’s Title V Air Permit and the Clean Air Act (“CAA”). The scope of the inspection was a partial compliance evaluation (“PCE”) to evaluate the facility’s compliance with the facility’s Title V operating permit, Louisiana State Implementation Plan (“SIP”), and applicable CAA regulations. The inspection focused primarily on the National Emissions Standard for Hazardous Air Pollutants (“NESHAP”) for Benzene Waste Operations at 40 Code of Federal Regulations (“CFR”) Part 61, Subpart FF (“Subpart FF” or “BWON”).

Inspector Penland also presented his credentials and informed them that he would be conducting an inspection at the Facility for compliance with the Resource Conservation and Recovery Act (“RCRA”) under the authority of Section 3007 of RCRA. The RCRA inspection was conducted in conjunction with the CAA inspection. This inspection focused on the generation and management of the wastewater generated by operations at the Facility.

FACILITY DESCRIPTION

Vopak Industrial Infrastructure Americas St. Charles, LLC owns and operates the Vopak Terminal St. Charles facility, a for-hire bulk terminal, near Hahnville, Louisiana. Vopak is collocated with Union Carbide’s St. Charles Operations and supports Union Carbide’s operations. Vopak stores raw material, product, and wastewater for Union Carbide. The wastewater stored at Vopak is generated by chemical manufacturing process plants, including ethylene production units, at Union Carbide. Other chemical and petroleum products are transferred in and out of terminal tankage for external customers via marine vessel, tank truck, and/or railcar.

The Facility was previously owned and operated by Union Carbide. Ownership of the terminal was transferred to Vopak on December 1, 2020. On January 14, 2021, Vopak requested the transfer of CAA Title V permit 3175-V0 from Union Carbide to Vopak. On May 4, 2021, LDEQ confirmed the transfer of the permit and issued an effective date of December 1, 2020.

Vopak currently operates under CAA Part 70 Operating Permit No. 2520-00186-V1 issued by LDEQ on August 31, 2022, which expired on July 18, 2024. A Title V permit modification and renewal application

was submitted to LDEQ via email on January 18, 2024. A copy of Operating Permit No. 2520-00186-V1 and a copy of the January 2024 renewal application are found in Appendix 2 and 3, respectively.

Section II - OBSERVATIONS

EPA inspectors met with Vopak representatives Mr. Duhe and Ms. Phillips in Union Carbide's conference room to discuss the scope of the inspection and planned inspection activities. We shared our intent to tour of the facility and conduct interviews with facility personnel.

After the opening conference, EPA Inspectors Sophia Ong, Constantinos Loukeris, Kara Allen, and John Penland ("we") entered the Vopak facility at 1:49 pm. Mr. Duhe and Ms. Phillips accompanied us to the Facility. The other EPA inspectors, Colleen McCarthy, Ben Rosenthal, Victoria Nelson, and Karina Kuc, did not join the facility tour. Constantinos Loukeris operated a FLIR Gx620 Optical Gas Imaging ("OGI") camera to image equipment for hydrocarbon emissions while in the field. Kara Allen conducted EPA Method 21 monitoring using a Thermo Scientific Toxic Vapor Analyzer ("TVA"), Model 2020, equipped with a flame ionization detector ("FID") to detect the total volatile organic compounds ("VOCs"). OGI videos taken during the inspection are found in Appendix 1.

At 2:00 pm, we arrived at Vopak's Dock 1 with Mr. Duhe and Dennis Fleming, a Leak Detection and Repair ("LDAR") technician and site supervisor with Think Environmental, Vopak's contracted LDAR company. At the dock, we met Armando Evangelisa, Dock Technician/Operator. Mr. Evangelisa explained that Vopak, at a minimum, unloads naphtha, dripolene and propylene from barges to the Facility. Vopak indicated they load approximately two barges per month of dripolene. We observed piping labeled crude butadiene, dripolene, EPD, naphtha, propylene LD, and propylene UNIC at the dock. Mr. Evangelisa provided clarification stating EPD is also known as EOB, Union Carbide's wastewater treatment plant. Dock 1 is equipped with a thermal treatment unit for loading dripolene barges. In addition, Vopak blows down the hose lines that load the barges with air into the barge itself. While at the dock, Mr. Evangelisa stated he was waiting for a barge to load crude butadiene.

Inspectors monitored two sump covers, six manhole covers, valves, and connectors on the dripolene vapor line and propylene lines with the FID at Dock 1. Inspectors also observed the same equipment with the OGI camera. No detectable emissions were observed at Dock 1 with the FID or hydrocarbons imaging with the OGI camera.

As we were departing from the dock at 2:34 pm, we observed a Kirby barge arriving at Dock 1.

At 2:55 pm, we arrived at four external floating roof ("EFR") storage tanks (TK 1301, TK 1311, TK 1321, and TK 1331) and met Charles Patterson, Vopak Shift Supervisor. Vopak stores benzene-containing wastewater generated by the collocated Union Carbide chemical manufacturing plants into the four EFR tanks.

EPA inspectors Constantinos Loukeris and John Penland observed the floating roofs of the following wastewater tanks from the platform at the top of the tanks' stairwells: TK 1301, TK 1311, TK 1321, and TK 1331. No emissions were observed with the OGI camera from TK 1301, TK 1311, and TK 1331. EPA Inspector Constantinos Loukeris observed hydrocarbon emissions with the OGI camera from the floating roof seal of wastewater tank TK 1321 (Videos 1-2). [AOC 1]

EPA inspector Kara Allen conducted EPA Method 21 monitoring at the pumps and quench piping associated with the wastewater tanks. Mr. Fleming accompanied the EPA inspection team to conduct concurrent Method 21 monitoring. Mr. Fleming informed EPA inspectors that Think Environmental conducts Method 21 monitoring on an annual basis at Vopak, typically in the third quarter of the calendar year. The EPA inspection team did not observe detectable emissions at the pumps and quench lines associated with the wastewater tanks with the FID.

At 3:52 pm, EPA Inspectors Constantinos Loukeris, Kara Allen, and Sophia Ong observed dripolene storage tank, TK 6200, with the OGI camera from the platform at the top of the tank's stairwell. EPA Inspector Constantinos Loukeris observed hydrocarbon emissions with the OGI camera from the seal of the floating roof on TK 6200 (Video 3). [AOC 2] Charles Patterson stated material in TK 6200 can be routed back to Union Carbide's Olefins 1 Unit.

At 4:13 pm, we arrived at the naphtha storage tanks area. We observed two naphtha tanks, TK 3100 and TK 5101, and their associated pumps and piping from the ground. TK 3101 was out of service at the time of inspection. Mr. Patterson stated the naphtha tanks have been static with no movement of product for the past three years.

We concluded our site tour at 4:48 pm. We returned to Union Carbide's conference room with the other EPA inspectors who did not join the Vopak facility tour.

Section III – AREAS OF CONCERN

EPA Inspectors Constantinos Loukeris, Colleen McCarthy, and Sophia Ong, conducted a virtual closing conference on October 25, 2024, at 9:00 am, for the inspection. Facility representatives Alex Ledet, Technical Manager; Kory Pourciau, Terminal Manager; Gerard Zeringue, Manager; and Kelly Phillips were present for the closing conference. During the closing conference, we summarized the facility tour and presented our observations, including the Areas of Concern ("AOC") 1 through 3. AOC 4 and 5 were determined after the closing conference. The facility made no claims of confidential business information regarding the videos taken on-site. The facility was informed that copies of the videos would be made available to the facility following the inspection.

- 1) EPA Inspectors observed hydrocarbon emissions from TK 1321 using the OGI camera. This indicates the tank may not be meeting the applicable design, operational, and maintenance standards.

- 2) EPA Inspectors observed hydrocarbon emissions from TK 6200 using the OGI camera. This indicates the tank may not be meeting the applicable design, operational, and maintenance standards.
- 3) EPA Inspectors indicated that the wastewater streams that are being received by Vopak from Union Carbide may be subject to the control standards for BWON and thus Vopak may not be maintaining those streams as controlled by not complying with the BWON requirements as specified in 40 C.F.R. 61 Subpart FF.
- 4) Vopak may be misrepresenting the Facility's federal Clean Air Act applicability. EPA inspectors identified a letter dated June 6, 2023, sent from Vopak to LDEQ documenting the non-applicability determination of the Facility to BWON. The letter states, "[t]he St. Charles Terminal does not contain facilities that treat, store, or dispose of benzene-containing hazardous waste from chemical manufacturing plants, coke by-product recovery plants, or petroleum refineries. As of December 1, 2020, the St. Charles Terminal was no longer an affected facility subject to BWON." Vopak does receive and store benzene-containing waste from chemical manufacturing plants. A copy of the letter can be found in Appendix 4.

In a permit renewal application received by LDEQ on January 18, 2024, Vopak requests to remove applicability to 40 C.F.R. 61 Subpart FF. The application states, "The Vopak Terminal is not a chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery. Additionally, it is not a hazardous waste treatment, storage, or disposal facility that treats, stores, or disposes of hazardous waste generated by a chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery." Vopak does receive and store benzene-containing hazardous waste generated by chemical manufacturing plants. In the permit application, Vopak represents the four EFR tanks, 1301, 1311, 1321, and 1331 with potential to store wastewater or dripolene. Upon review of the emission calculations provided in the permit application, tanks 1301, 1311, 1321, and 1331 have not been identified as dedicated wastewater storage tanks.

In their response to our records request, Vopak stated Subpart FF quarterly inspection records were no longer maintained since 2023 and Total Annual Benzene ("TAB") reports were not prepared since 2022, for calendar year 2021. They also stated that since the EPA inspection they have directed that such quarterly inspections and TAB reports should be resumed. The TAB report for 2021 and quarterly Subpart FF reports for 2021 submitted by Vopak include conflicting information. In the 2021 TAB report, Vopak states they are subject to the control requirements since the TAB was previously greater than 10 megagrams per year ("Mg/yr"). They indicate that they elect to follow the provisions of 40 CFR 61.342(e) also known as the "6 BQ" option. In the actual report for 2021, they claim the TAB is 0.03 Mg/yr and only identify one point of generation. The point of generation identified is labeled "Quench Oil/T68 and soil" which appears to be multiple points and may not be the location where the material exits the process.

- 5) Vopak may be operating hazardous waste storage tanks without a permit and without meeting the permit exemption requirements for hazardous waste generators. Vopak receives wastewater from Union Carbide's St. Charles Operations Olefins units which exceeds 5.0mg/L of benzene and is a hazardous waste demonstrating the toxicity characteristic for benzene (D018). This wastewater is accumulated in tanks 1301, 1311, 1321, and 1331 before being returned to the Union Carbide for additional treatment. As tanks being used for the accumulation of hazardous waste, they would normally fall under the RCRA tank requirements for hazardous waste generators codified at 40 CFR Part 262. However, these tanks are claimed by Vopak as exempt from the RCRA generator standards under the exemption for units subject to the Clean Water Act. However, as noted in AOC 4, in their Clean Air Act permit application they can use these tanks for the storage of both wastewater and product/intermediate materials. The wastewater treatment unit exemption claimed for the four tanks requires that the tanks are dedicated to the management of wastewater. Therefore, since these tanks are not dedicated solely for the management of wastewater, they may not qualify for the wastewater treatment unit exemption from RCRA permitting.

Section IV – FOLLOW UP

On October 29, 2024, EPA Inspector Sophia Ong requested the following records after the closing conference from Vopak:

1. For tanks 1301, 1311, 1321, 1331, 3100, 3101, 4101, 5101, and 6200, provide the following:
 - a. Most recent seal gap measurement inspections;
 - b. Most recent API 653 inspections; and
 - c. All repair and maintenance records from date of ownership to present.
2. Quarterly Visual Inspection records from date of ownership to present;
3. Annual Total Annual Benzene (TAB) reports and all supporting documents from date of ownership to present;
4. No detectable emissions testing/monitoring data as required by 40 CFR 61.356(h) from date of ownership to present;
5. Engineering Design Documentation for each waste management unit and treatment process required by 40 CFR 61.356(d);
6. BWON Manual and/or BWON training; and
7. Initial Notification and Notification of Compliance Status for Part 63 Subpart EEEE.

Vopak provided records to EPA on November 15, 2024.

Section V – LIST OF APPENDICES

Appendix 1 – Video Log – 3 FLIR videos taken 09/24/2024

Appendix 2 – Operating Permit No. 2520-00186-V1

Appendix 3 – Title V Operating Permit Renewal Application January 2024

Appendix 4 – Vopak's Letter to LDEQ of Non-applicability of Subpart FF

Vopak Industrial Infrastructure Americas St. Charles, LLC / Vopak Terminal St. Charles
Inspection Date 09/24/2024

Appendix 1

Video Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

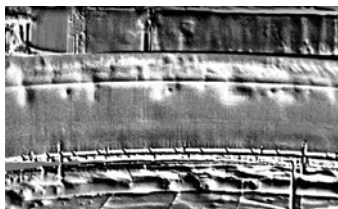
Video Log

Location: Vopak Industrial Infrastructure Americas St. Charles, LLC / Vopak Terminal St. Charles		
City: Hahnville	County: St. Charles	State: Louisiana



Video 1

Video File Name: [FLIR00196.mp4](#)
Date of Video: 09/24/2024
Time of Video: 15:28
Videographer: Constantinos Loukeris
Description: Hydrocarbon emissions observed from TK 1321.



Video 2

Video File Name: [FLIR0197.mp4](#)
Date of Video: 09/24/2024
Time of Video: 15:30
Videographer: Constantinos Loukeris
Description: Hydrocarbon emissions observed from TK 1321.



Video 3

Video File Name: [FLIR0198.mp4](#)
Date of Video: 09/24/2024
Time of Video: 16:01
Videographer: Constantinos Loukeris
Description: Hydrocarbon emissions observed from TK 6200.

Vopak Industrial Infrastructure Americas St. Charles, LLC / Vopak Terminal St. Charles
Inspection Date 09/24/2024

Appendix 2

Operating Permit No. 2520-00186-V1



AIR PERMIT ROUTING/APPROVAL SLIP-Permits



AI No.	227637	Company		Date Received	February 1, 2022
Activity No.	PER20220001	Facility	Vopak Industrial Infrastructure	Permit Type	
CDS No.	2520-00186	Permit No.	3175-V1 2520-00186-V1	Expedited Permit	☐ yes ☒ no

1. Technical Review	Approved	Date rec'd	Date FW	Comments
Permit Writer	<i>meow</i>		05/21/22	minor modification
Air Quality / Modeling				
Toxics				
PSD/NNSR				
Technical Advisor	<i>Dan</i>		6/1/22	
Supervisor				
Other				
2. Management Review (if PN req'd)	Approved	Date rec'd	Date FW	Comments
Supervisor				
Manager				
Administrator				
Assistant Secretary (PN)				Public hearing ☐ yes ☐ no
3. Response to Comments (if PN req'd)	Approved	Date rec'd	Date FW	Comments
Supervisor				
Manager				
Administrator				
Legal (BFD)				
4. Final Approval	Approved	Date rec'd	Date FW	Comments
Supervisor				
Manager	<i>KAP</i>			<i>As noted</i>
Administrator <i>for</i>	<i>[Signature]</i>		8/25/2022	<i>as noted</i>
Assistant Secretary	<i>[Signature]</i>		8/18/2022	
1. Technical Review				
PN of App needed	☐ yes ☒ no	Date of PN of App		Newspaper
Fee paid	☒ yes ☐ no			
NPS applies	☒ yes ☐ no	PSD/NNSR applies	☐ yes ☒ no	NESHAP applies ☒ yes ☐ no
2. Post-Technical Review				
Company technical review	☒ yes ☐ no ☐ n/a	E-mail date	4/22/22	Remarks received ☐ yes ☐ no
Surveillance technical review	☐ yes ☐ no ☒ n/a	E-mail date		Remarks received ☐ yes ☐ no
3. Public Notice				
Public Notice Required	☐ yes ☒ no			
Library				
LDEQ Website	PN Date			
Company notification e-mail sent	Date e-mailed			
EPA PN notification e-mail sent	Date e-mailed			
OES PN mailout	Date mailed			
4. Final Review				
Public comments received	☐ yes ☐ no	EPA comments rec'd	☐ yes ☐ no	
Company comments received	☐ yes ☐ no	PN info entered into Permit Sec VI	☐ yes ☐ no	
Comments				



JOHN BEL EDWARDS
GOVERNOR

CHUCK CARR BROWN, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.: 7021 1970 0000 3978 5434

Activity No.: PER20220001
Agency Interest No.: 227637

Mr. Alex Ledet
Operations Manager
Vopak Terminal St. Charles
Vopak Industrial Infrastructure Americas St. Charles, LLC
355 LA Highway 3142, Building 732
Hahnville, LA 70057

RE: Part 70 Operating Permit Modification
Vopak Terminal St. Charles, Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

Dear Mr. Ledet:

This is to inform you that the Part 70 operating permit modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the 19th of July, 2024, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this 31st day of August, 2022.

Permit No.: 2520-00186-V1

Sincerely,

Bliss M. Higgins
Assistant Secretary
BMH: MDW
c: EPA Region VI

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

I. Background

Vopak Terminal St. Charles, formerly Marine and Terminal Operations, is a for-hire bulk terminal owned and operated by Vopak Industrial Infrastructure Americas St. Charles, LLC. It was previously owned and operated by Union Carbide Corporation (Agency Interest No. 2083) under Permit No. 3175-V0, issued June 4, 2021. The terminal ownership was transferred to Vopak Industrial Infrastructure Americas St. Charles, LLC on May 4, 2021, along with the facility name change. Part 70 Operating Permit No. 2520-00186-V0 was issued on March 15, 2022.

This Part 70 operating permit addresses all emission sources at the facility.

II. Origin

A permit application dated January 27, 2022, was submitted by Vopak Industrial Infrastructure Americas St. Charles, LLC requesting a Part 70 operating permit modification for Vopak Terminal St. Charles.

III. Description

Vopak Terminal St. Charles is a for-hire bulk terminal. Chemical and petroleum products are transferred into and out of terminal tankage by external customers via marine vessel, or by tank truck, and/or railcar. Emissions generated by operations at the site are reduced through utilization of air pollution control equipment including:

- A marine vapor recovery thermal treatment unit - No. 1 Dock Thermal Treatment Unit (TTU, enclosed flare) (EPN 668, EQT054) for barge loading of dripolene;
- An acrylate Thermal Treatment Unit (TTU, enclosed flare) (EPN 3414, EQT059) for rail, truck, and marine loading of acrylate. The loading emission points routed to the acrylate TTU are No. 1 T/C Rack, No. 2 Dock, and No. 1 T/T Rack (EPNs 617, 625 and 3416, EQTs 043, 045, and 061, respectively). Note that the acrylate TTU only controls loading of acrylates, which includes: acrylate (non-TAP), EHA, Ethyl Acrylate, Methyl Acrylate, and Methyl Methacrylate. There are other products loaded at those points that are not controlled by the acrylate TTU;
- The acrylate TTU (EPN 3414) is also used to control emissions from the following seven tanks:

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana**

Tank 2210 (EPN 533, EQT 0023)
Tank 2230 (EPN 538, EQT 0027)
Tank 2330 (EPN 553, EQT 0033)
Tank 2336 (EPN 555, EQT 0034)
Tank 2337 (EPN 637, EQT 0050)
Tank 2350 (EPN 638, EQT 0051)
Tank 2320 (EPN 552, EQT 0072);

- Scrubbing of rail and truck loading of amines (EPNs 3407, 3409, and 3410, EQTs 056, 057, and 058);
- Flaring of tank car cleaning;
- Non-venting pressurized tanks for materials such as ammonia and propylene;
- Recycling of pressure tank losses to process units for materials such as butadiene and propylene;
- Internal floating roofs for storage of materials such as butanol and methanol;
- External floating roofs for storage for dripolene, naphtha, and/or wastewater (water and 4% dripolene); and
- Fixed roof tanks for storage of low vapor pressure materials.

A new acrylate TTU (EPN 3427, EQT076) will replace an old acrylate TTU (EPN 3414, EQT059) and they will not run simultaneously. The old TTU (EPN 3414, EQT059) will be taken out of service after the new TTU (EPN 3427, EQT076) is constructed and put in service and will be removed from permit.

In this permit modification, Vopak Terminal St. Charles proposes to install an internal floating roof (IFR) on Tank 2220 (EPN 536, EQT025) and remove the connection from the tank to the Acrylate TTU (EPN 3414, EQT059). Tank 2220 was equipped with a fixed roof, with vapors routed to the TTU for destruction; the IFR will improve control of tank emissions, thus making control by TTU unnecessary. Emissions and requirements for Tank 2220 are being revised as well.

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

Permitted emissions from the facility, in tons per year, are as follows:

Pollutant	Before	After	Change
PM ₁₀	0.43	0.43	-
PM _{2.5}	0.43	0.43	-
SO ₂	0.03	0.03	-
NO _x	5.72	5.69	- 0.03
CO	4.80	4.77	- 0.03
VOC	276.47	276.21	- 0.26

LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
1,2-Dichloroethane	0.003	0.003	-
1,3-Butadiene	10.985	10.985	-
1,4-Dioxane	< 0.01	< 0.01	-
1-Methylnaphthalene	0.33	0.33	-
2,2,4-Trimethylpentane	0.15	0.15	-
Acetaldehyde	1.47	1.47	-
Acrylic Acid	0.21	0.21	-
Antimony (and compounds)	< 0.01	< 0.01	-
Barium (and compounds)	< 0.01	< 0.01	-
Benzene	10.39	10.39	-
Biphenyl	0.04	0.04	-
Cadmium (and compounds)	< 0.01	< 0.01	-
Cresol	0.19	0.19	-
Cumene	5.87	5.87	-
Diethanolamine	1.46	1.46	-
Ethyl Acrylate	0.61	0.61	-
Ethyl Benzene	3.05	3.05	-
Ethylene Glycol	1.95	1.95	-
Formaldehyde	0.11	0.11	-
Glycol Ethers (Table 51.1)	0.01	0.01	-
Glycol Ethers (Table 51.3)	7.39	7.39	-
Hydrogen Sulfide	0.41	0.41	-
Hydroquinone	< 0.01	< 0.01	-
Methanol	1.35	1.12	- 0.23
Methyl Cellosolve Acetate	< 0.01	< 0.01	-
Methyl ethyl ketone	0.01	0.01	-
Methyl isobutyl ketone	0.02	0.02	-
Methyl Methacrylate	0.20	0.20	-

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
Naphthalene	3.21	3.21	-
n-Butyl Alcohol	7.23	7.23	-
n-Hexane	29.42	29.42	-
Phenol	0.23	0.23	-
Polynuclear Aromatic Hydrocarbons	0.077	0.077	-
Quinoline	0.07	0.07	-
Styrene	1.03	1.03	-
Sulfuric acid	< 0.01	< 0.01	-
Toluene	9.87	9.87	-
Xylene (mixed isomers)	15.33	15.33	-
TOTAL	112.68	112.45	- 0.23

IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD) review is not required.

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. Public Notice

Public notice is not required for a Title V permit minor modification.

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

VII. Effects on Ambient Air

Based on the level of permitted emissions, emissions from the facility are not anticipated to prevent the attainment or maintenance of any state or national ambient air quality standard.

VIII. General Condition XVII Activities

Work Activity	Schedule Events/yr	Emission Rates – tons/year				
		PM ₁₀ /PM _{2.5}	SO ₂	NO _x	CO	VOC
1. Hose connect/disconnect	500,000	-	-	-	-	0.20
2. Truck & railcar sampling	50,000	-	-	-	-	0.83
3. Pump replacement	400	-	-	-	-	<0.01
4. In-line item replacement	400	-	-	-	-	<0.01
5. Storage tank/process vessel relief device replacement	400	-	-	-	-	<0.01
6. Tank cleaning	20	-	-	-	-	<5.00
7. Acrylate TTU maintenance	240 hours	<0.01	-	0.06	<0.01	0.18
8. Tank degassing	45 tanks	0.34	-	3.78	2.43	3.71
9. Process sampling activities	10,800	-	-	-	-	0.02
10. Solids loading & unloading	400	0.40	-	-	-	-
11. Filter changes	450	-	-	-	-	0.07
12. Tank/rail car cleaning/ venting	4,000	-	-	-	-	4.00
13. Hatch sampling	30,000	-	-	-	-	2.00
14. Pigging activities	668	-	-	-	-	0.67

IX. Insignificant Activities

None.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	LAC 33:III.Chapter																			
		5▲	9	11	13	15	1101	1105	1311	1313	1513	2103	2107	2108	2111	2115	2131	29*	51*	56	59*
UNF0002	Vopak Terminal St. Charles	1	1	1	1								1						1	1	1
EQT0001	607 - Tank 3101											1									
EQT0002	499 - Tank 1200											3									
EQT0003	500 - Tank 1117											3									
EQT0004	501 - Tank 1115											3									
EQT0005	502 - Tank 1114											3									
EQT0006	503 - Tank 2239											3									
EQT0007	504 - Tank 2238											3									
EQT0008	505 - Tank 2313											3									
EQT0009	506 - Tank 2222											3									
EQT0010	511 - Tank 1116											3									
EQT0011	513 - Tank 1119											3									
EQT0012	514 - Tank 1310											3									
EQT0013	515 - Tank 1320 (IFR)											3									
EQT0014	516 - Tank 1321 (EFR)											1									
EQT0015	517 - Tank 1330											3									
EQT0016	518 - Tank 1331 (EFR)											1									

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	LAC 33:III.Chapter																			
		5▲	9	11	13	15	1101	1105	1311	1313	1513	2103	2107	2108	2111	2115	2131	29*	51*	56	59*
EQT0017	519 - Tank 1341 (IFR)										3										
EQT0018	520 - Tank 2104										3								1		
EQT0019	521 - Tank 2106										3										
EQT0020	523 - Tank 2109										3										
EQT0021	531 - Tank 2202										3										
EQT0022	532 - Tank 2206										3										
EQT0023	533 - Tank 2210										1										
EQT0024	534 - Tank 2211										3								1		
EQT0025	536 - Tank 2220-Methanol										1										
EQT0026	537 - Tank 2221										3								1		
EQT0027	538 - Tank 2230-Ethyl Acrylate										3										
EQT0028	540 - Tank 2247										3										
EQT0029	541 - Tank 2248										3										
EQT0030	542 - Tank 2249										3										
EQT0031	547 - Tank 2314										3										
EQT0032	571 - Tank 2141 Hexene Tank (Non Venting Sphere)										1										
EQT0033	553 - Tank 2330-Butyl Acrylate										3										

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	LAC 33:III.Chapter																			
		5▲	9	11	13	15	1101	1105	1311	1313	1513	2103	2107	2108	2111	2115	2131	29*	51*	56	59*
EQT0034	555 - Tank 2336											3									
EQT0035	598 - Tank 1229											3									
EQT0036	599 - Tank 1300 (IFR)											1							1		
EQT0037	600 - Tank 1301 (EFR)											1									
EQT0038	601 - Tank 1311 (EFR)											1									
EQT0039	602 - Tank 2102 (IFR)											1									
EQT0040	603 - Tank 2205 (IFR)											1									
EQT0041	606 - Tank 3100 (EFR)											1									
EQT0042	608 - Tank 4101 (EFR)											1									
EQT0043	†617 - No. 1 T/C Rack	1																			
EQT0044	†619 - No. 3 T/C Rack	1																			
EQT0045	†625 - No. 2 Dock	1																			
EQT0046	†625A - No. 1 Dock	1												1							
EQT0047	632 - Tank 1340 (IFR)											3									
EQT0048	633 - Tank 5101 (EFR)											1									
EQT0049	634 - Tank 6200 (EFR)											1									
EQT0050	637 - Tank 2337											3									

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	LAC 33:III.Chapter																			
		5▲	9	11	13	15	1101	1105	1311	1313	1513	2103	2107	2108	2111	2115	2131	29*	51*	56	59*
EQT0051	638 - Tank 2350										3										
EQT0052	639 - Tank 2231										3										
EQT0053	640 - Tank 2307										3										
EQT0054	668 - No. 1 Dock Thermal Treatment Unit	1		1	1	3	1						1								
EQT0055	3402 - Tank 2204	1									3										
EQT0056	3407 - Overland Amines Scrubber	1																			
EQT0057	3409 - No. 2 Dock Amines Scrubber	1																			
EQT0058	3410 - EDA Scrubber	1																			
EQT0059	3414 - Acrylate Thermal Treatment Unit			1	1	3															
EQT0060	3415 - Tank 1230										3										
EQT0061	†3416 - No. 1 T/T Rack	1																			
EQT0062	572 - Tank 2142-Butane/Propane										1										
EQT0063	573 - Tank 2143-Butane/Propane										1										
EQT0064	574 - Tank 2144-Propylene										1										
EQT0065	575 - Tank 2145-Propylene										1										
EQT0066	635 - Tank 6220-Crude Butadiene										1										
EQT0067	635A - Tank 6210-Crude Butadiene										1										
EQT0068	636 - Tank 6230 Propylene Tank										1										

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	LAC 33:III.Chapter																			
		5▲	9	11	13	15	1101	1105	1311	1313	1513	2103	2107	2108	2111	2115	2131	29*	51*	56	59*
EQT0069	586 - Tank 2339-Ammonia Tank (Non Venting Bullet)																				
EQT0070	587 - Tank 2340-Ammonia Tank (Non Venting Bullet)																				
EQT0071	3420 - Tank 2326										3										
EQT0072	552 - Tank 2320-Methyl Acrylate										1										
EQT0073	3425 - Tank 2302										3										
EQT0074	3426 - Tank 2315	1									3										
EQT0075	3424 - Tank 2301-Ethylenediamine (EDA)	1									3										
EQT0076	3427 - Acrylate Thermal Treatment Unit			1	1	3															
FUG0001	Equipment Fugitives	1												1							
GRP0001	†3400 - Transfer Operation Cap	1																			
SCN0001	†Group 2 Transfer Operations	1										3	2								
SCN0002	†Acrylates (Non-TAP) Loading	1										3	2								
SCN0003	†Ethyl Acrylate Loading	1										3	2								
SCN0004	†Dripolene Dock Loading	1											1								
SCN0005	†Crude Butadiene/Propylene Dock Loading	1											1								
SCN0006	†Amines Loading	1										3	2								

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles

Agency Interest No. 227637

Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	LAC 33:III.Chapter																			
		5▲	9	11	13	15	1101	1105	1311	1313	1513	2103	2107	2108	2111	2115	2131	29*	51*	56	59*
SCN0007	†Other Loading											3	2								

* The regulations indicated above are State Only regulations.

† The emissions from all loading racks are capped under Emission Point 3400. The regulations applicable to the loading racks depend on the material loaded. Applicable regulatory requirements are included in separate loading groups.

▲ All LAC 33:III.Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the “Specific Requirements” report specifically states that the regulation is State Only.

KEY TO MATRIX

- 1 - The regulations have applicable requirements that apply to this particular emission source.
 - The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
 - 2 - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria change the source will have to comply at a future date.
 - 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
- Blank – The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60				40 CFR 61						40 CFR 63												40 CFR			
		A	K	Kb	VV	A	J	M	V	BB	F F	A	F	G	H	Y	S S	T T	U U	W W	YY	EE EE	FFF F	64	68	70	82
UNF0002	Vopak Terminal St. Charles	1				1					1	1	1	1					**		1	1	1		1	1	1
EQT0001	607 - Tank 3101			1							1		3	3						**	1	3	3				
EQT0002	499 - Tank 1200			3									3	3								3	3				
EQT0003	500 - Tank 1117			3										1								3					
EQT0004	501 - Tank 1115			3									3	3								3					
EQT0005	502 - Tank 1114			3									3	3								3					
EQT0006	503 - Tank 2239			3										1								3					
EQT0007	504 - Tank 2238			3										1								3					
EQT0008	505 - Tank 2313			3										1								3					
EQT0009	506 - Tank 2222			3										1								3					
EQT0010	511 - Tank 1116			3									3	3								3	3				
EQT0011	513 - Tank 1119			3									3	3								3	3				
EQT0012	514 - Tank 1310		3																		3	3					
EQT0013	515 - Tank 1320 (IFR)			3									3	3								3	3				
EQT0014	516 - Tank 1321 (EFR)		3	3*							1									**	1	3					
EQT0015	517 - Tank 1330			3																	3	3					

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
 Agency Interest No. 227637
 Vopak Industrial Infrastructure Americas St. Charles, LLC
 Taft, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60				40 CFR 61						40 CFR 63												40 CFR			
		A	K	Kb	VV	A	J	M	V	BB	F F	A	F	G	H	Y	S S	T T	U U	W W	YY	EE EE	FFF F	64	68	70	82
EQT0016	518 - Tank 1331 (EFR)		3	3*							1									**	1	3					
EQT0017	519 - Tank 1341 (IFR)			3									3	3								3	3				
EQT0018	520 - Tank 2104			3									3	3								3					
EQT0019	521 - Tank 2106			3										1								3					
EQT0020	523 - Tank 2109			3										1								3					
EQT0021	531 - Tank 2202			3										1								3					
EQT0022	532 - Tank 2206			3																		3	3				
EQT0023	533 - Tank 2210			3									3	3								3					
EQT0024	534 - Tank 2211			3									3	3								3					
EQT0025	536 - Tank 2220-Methanol			3										1								3					
EQT0026	537 - Tank 2221			3									3	3								3					
EQT0027	538 - Tank 2230-Ethyl Acrylate			3									3	3			**					1					
EQT0028	540 - Tank 2247			3										1								3					
EQT0029	541 - Tank 2248			3										1								3					
EQT0030	542 - Tank 2249			3									3									3					
EQT0031	547 - Tank 2314			3										1								3					

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
 Agency Interest No. 227637
 Vopak Industrial Infrastructure Americas St. Charles, LLC
 Taft, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60				40 CFR 61						40 CFR 63												40 CFR			
		A	K	Kb	VV	A	J	M	V	BB	F F	A	F	G	H	Y	S S	T T	U U	W W	YY	EE EE	FFF F	64	68	70	82
EQT0032	571 - Tank 2141 Hexene Tank (Non Venting Sphere)																										
EQT0033	553 - Tank 2330-Butyl Acrylate			3									3	3								3					
EQT0034	555 - Tank 2336			3									3	3								3					
EQT0035	598 - Tank 1229			3									3	3								3	3				
EQT0036	599 - Tank 1300 (IFR)			3																	3	3					
EQT0037	600 - Tank 1301 (EFR)		3	3*							1									**	1	3					
EQT0038	601 - Tank 1311 (EFR)		3	3*							1									**	1	3					
EQT0039	602 - Tank 2102 (IFR)			3										1								3					
EQT0040	603 - Tank 2205-(IFR)			3									3	3								3					
EQT0041	606 - Tank 3100 (EFR)		3	3*							1									**	1	3					
EQT0042	608 - Tank 4101 (EFR)		3	3*							1									**	1	3					
EQT0043	†617 - No. 1 T/C Rack																										
EQT0044	†619 - No. 3 T/C Rack																										
EQT0045	†625 - No. 2 Dock															1											
EQT0046	†625A - No. 1 Dock															1											
EQT0047	632 - Tank 1340 (IFR)			3									3	3								3	3				

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60				40 CFR 61						40 CFR 63												40 CFR			
		A	K	Kb	VV	A	J	M	V	BB	F F	A	F	G	H	Y	S S	T T	U U	W W	YY	EE EE	FFF F	64	68	70	82
EQT0048	633 - Tank 5101 (EFR)		3	3*							1									**	1	3					
EQT0049	634 - Tank 6200 (EFR)		3	3*							1									**	1	3					
EQT0050	637 - Tank 2337			3									3	3								3					
EQT0051	638 - Tank 2350			3									3	3								3					
EQT0052	639 - Tank 2231			3									3	3								3	3				
EQT0053	640 - Tank 2307			3									3	3								3	3				
EQT0054	668 - No. 1 Dock Thermal Treatment Unit															1								2			
EQT0055	3402 - Tank 2204			3									3									3					
EQT0056	3407 - Overland Amines Scrubber																							3			
EQT0057	3409 - No. 2 Dock Amines Scrubber																							3			
EQT0058	3410 - EDA Scrubber																							3			
EQT0059	3414 - Acrylate Thermal Treatment Unit												3	3			**					1		2			
EQT0060	3415 - Tank 1230			3									3	3								3	3				
EQT0061	†3416 - No. 1 T/T Rack																										
EQT0062	572 - Tank 2142-Butane/Propane			3																	3	3					
EQT0063	573 - Tank 2143-Butane/Propane			3																	3	3					

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60				40 CFR 61						40 CFR 63												40 CFR			
		A	K	Kb	VV	A	J	M	V	BB	F F	A	F	G	H	Y	S S	T T	U U	W W	YY	EE EE	FFF F	64	68	70	82
EQT0064	574 - Tank 2144-Propylene			3																	3	3					
EQT0065	575 - Tank 2145-Propylene			3																	3	3					
EQT0066	635 - Tank 6220-Crude Butadiene			3																	1	3					
EQT0067	635A - Tank 6210-Crude Butadiene			3																	1	3					
EQT0068	636 - Tank 6230-Propylene Tank-Propylene			3																	3	3					
EQT0069	586 - Tank 2339-Ammonia Tank (Non Venting Bullet)																										
EQT0070	587 - Tank 2340-Ammonia Tank (Non Venting Bullet)																										
EQT0071	3420 - Tank 2326			3									3	3								3	3				
EQT0072	552 - Tank 2320-Methyl Acrylate			3									3	3								3					
EQT0073	3425 - Tank 2302			3									3	3								3	3				
EQT0074	3426 - Tank 2315			3									3	3								3	3				
EQT0075	3424 - Tank 2301-Ethylenediamine (EDA)			3									3	3								3	3				
EQT0076	3427 - Acrylate Thermal Treatment Unit												3	3			**					1		2			
FUG0001	Equipment Fugitives				1		1		1			1			1		**		**		1	1	1				
GRP0001	†3400 - Transfer Operation Cap																										
SCN0001	†Group 2 Transfer Operations													1													

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60				40 CFR 61						40 CFR 63												40 CFR			
		A	K	Kb	VV	A	J	M	V	BB	F F	A	F	G	H	Y	S S	T T	U U	W W	YY	EE EE	FFF F	64	68	70	82
SCN0002	†Acrylates (Non-TAP) Loading												3	3													
SCN0003	†Ethyl Acrylate Loading													1			**					1					
SCN0004	†Dripolene Dock Loading									1						1					1						
SCN0005	†Crude Butadiene/Propylene Dock Loading															1											
SCN0006	†Amines Loading																										
SCN0007	†Other Loading																										

*

Does not apply, but another subpart (NESHAP 40 CFR 61 Subpart FF) references the use of this subpart as the method of compliance.

**

Another subpart references this subpart (NESHAP Subpart YY references Subpart WW, and Subpart EEEE references Subpart SS/UU).

†

The emissions from all loading racks are capped under Emission Point 3400. The regulations applicable to the loading racks depend on the material loaded. Applicable regulatory requirements are included in separate loading groups.

KEY TO MATRIX

- The regulations have applicable requirements that apply to this particular emission source.
 - The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
 - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria change the source will have to comply at a future date.
 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
- Blank - The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No.	Requirement	Notes
EQT001 (Tank)	NESHAP Subpart F & G – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater [40 CFR 63.100 & 110]	DOES NOT APPLY. Tank is not in service of a chemical manufacturing process unit that meets all the criteria specified in 40 CFR 63.100(b)(1), (b)(2), and (b)(3).
	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) - Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. The tank is part of an affected source under another 40 CFR Part 63 NESHAP. [40 CFR 63.2338(c)(1)]
	NESHAP for Miscellaneous Organic Chemical Manufacturing (MON) [40 CFR 63 Subpart FFFF]	DOES NOT APPLY. The tank is not in service of a miscellaneous organic chemical manufacturing process unit. [40 CFR 63.2435(a)]
EQTs 002, 010, 011, 052 (VFR Tanks)	NESHAP Subpart F & G – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater [40 CFR 63.100 & 110]	DOES NOT APPLY. Tanks do not meet the definition of storage vessel per 40 CFR 63.101. Tanks do not store organic HAPs.
	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) – Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Does not meet the definition of an organic liquid per 40 CFR 63.2406.
	NESHAP for Miscellaneous Organic Chemical Manufacturing (MON) [40 CFR 63 Subpart FFFF]	DOES NOT APPLY. The tanks are not in service of a miscellaneous organic chemical manufacturing process unit. [40 CFR 63.2435(a)]
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. No construction, reconstruction, or modification after July 23, 1984.
	Control of Emissions of Organic Compounds: Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Vapor pressure of material stored is less than 1.5 psia.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles Agency Interest No. 227637 Vopak Industrial Infrastructure Americas St. Charles, LLC Taft, St. Charles Parish, Louisiana

X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No.	Requirement	Notes
EQTs 003, 006, 007, 008, 009, 019, 020, 021, 028, 029, 031 (Tanks)	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non Gasoline) (OLD) – Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Storage tanks are subject to SOCMHON; therefore, OLD not applicable per 40 CFR 63.2338(c)(1).
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. No construction, reconstruction, or modification after July 23, 1984.
	Control of Emissions of Organic Compounds: Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Vapor pressure of material stored is less than 1.5 psia.
EQTs 004, 005, 024 (Tanks)	NESHAP Subpart F & G – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater [40 CFR 63.100 & 110]	DOES NOT APPLY. Does not meet the definition of a storage vessel per 40 CFR 63.101. Tanks store HAPs only as impurities.
	NESHAP Subpart EEEE– National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) – Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Does not meet the definition of an organic liquid per 40 CFR 63.2406.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. No construction, reconstruction, or modification after July 23, 1984.
	Control of Emissions of Organic Compounds: Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Vapor pressure of material stored is less than 1.5 psia.
EQT012 (Tank, Quench Oil)	NESHAP Subpart YY – National Emission Standards for Hazardous Air Pollutants for Source Categories: Generic MACT Standards [40 CFR 63.1100]	DOES NOT APPLY. The maximum true vapor pressure of total organic HAP is < 3.4 kPa.
	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) – Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Does not meet the definition of an organic liquid per 40 CFR 63.2406.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No.	Requirement	Notes
EQT012 (Tank, Quench Oil) (continued)	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110]	DOES NOT APPLY. Storage vessel constructed, reconstructed, or modified prior to June 11, 1973.
	Control of Emissions of Organic Compounds: Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Vapor pressure of material stored is less than 1.5 psia.
EQTs 013, 017, 047 (IFR Tanks)	NESHAP Subpart F & G – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater [40 CFR 63.100 & 110]	DOES NOT APPLY. Tanks do not support CMPU subject to SOCMH HON.
	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) – Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Tanks store Butanol, which is a TAP but not a HAP; therefore, OLD doesn't apply.
	NESHAP Subpart FFFF – National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing (MON) – Storage Tanks [40 CFR 63.2430]	DOES NOT APPLY. Tanks store Butanol, which is a TAP but not a HAP; therefore, MON doesn't apply.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. Each tank's capacity > 39,891 gals (151 m ³) and VOC vapor pressure of material stored is < 0.5 psia. Additionally, tank (632) was not constructed, reconstructed, or modified after July 23, 1984.
	Control of Emissions of Organic Compounds: Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Vapor pressure of material stored is less than 1.5 psia.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No.	Requirement	Notes
EQTs 014, 016 (EFR Tanks)	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) – Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Storage tanks are subject to NESHAP Subpart YY; therefore, OLD is not applicable as per 40 CFR 63.2338(c)(1).
	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110]	DOES NOT APPLY. Storage vessels were constructed, reconstructed, or modified prior to June 11, 1973.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b])	DOES NOT APPLY. NSPS Subpart Kb is not applicable to these tanks because they were not constructed, reconstructed, or modified after July 23, 1984. Note: The permittee has chosen an alternative for compliance with NESHAP Subpart FF standards for tanks, specified under 40 CFR 61.351(a)(2). The alternative is compliance with an external floating roof meeting the requirements of NSPS Subpart Kb 40 CFR 60.112b. Tanks store Dripolene or Wastewater (4% Dripolene).
EQT015 (Tank)	NESHAP Subpart YY – National Emission Standards for Hazardous Air Pollutants for Source Categories: Generic MACT Standards [40 CFR 63.1100]	DOES NOT APPLY. The maximum true vapor pressure of total organic HAP is < 3.4 kPa.
	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) -Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Does not meet the definition of an organic liquid per 40 CFR 63.2406.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles Agency Interest No. 227637 Vopak Industrial Infrastructure Americas St. Charles, LLC Taft, St. Charles Parish, Louisiana

X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No.	Requirement	Notes
EQT015 (continued)	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. No construction, reconstruction, or modification after July 23, 1984.
	Control of Emissions of Organic Compounds: Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Vapor pressure of material stored is less than 1.5 psia.
EQTs 018, 026 (Tanks)	NESHAP Subpart F & G – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater [40 CFR 63.100 & 110]	DOES NOT APPLY. Does not meet the definition of a storage vessel per 40 CFR 63.101. Tanks store HAPs only as impurities.
	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) – Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Does not meet the definition of an organic liquid per 40 CFR 63.2406.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. No construction, reconstruction, or modification after July 23, 1984.
	Control of Emissions of Organic Compounds: Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Vapor pressure of material stored is less than 1.5 psia.
EQT022 (Tank)	NESHAP Subpart FFFF – National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing – Storage Tanks [40 CFR 63.2430]	DOES NOT APPLY. Does not meet the definition of a storage vessel per 40 CFR 63.2550. Tank stores organic HAPs only as impurities.
	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) – Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Does not meet the definition of an organic liquid per 40 CFR 63.2406. The annual average HAP true vapor pressure is < 0.1 psia.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. Construction, reconstruction, or modification commenced prior to July 23, 1984.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles Agency Interest No. 227637 Vopak Industrial Infrastructure Americas St. Charles, LLC Taft, St. Charles Parish, Louisiana

X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No.	Requirement	Notes
EQT022 (Tank) (continued)	Control of Emissions of Organic Compounds: Storage of Volatile Organic Compounds [LAC 33:III.2103.A]	DOES NOT APPLY. Vapor pressure of material stored is less than 1.5 psia.
EQT023 (Tank, Methyl Acrylate)	NESHAP Subpart F & G – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater [40 CFR 63.100 & 110]	DOES NOT APPLY. This is an intervening storage vessel between CMPU and storage vessel that is located in a tank farm. [40 CFR 63.100(g)(3)(i)]
	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) – Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Does not meet the definition of an organic liquid per 40 CFR 63.2406. [40 CFR 63.2338(b)]
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. No construction, reconstruction, or modification after July 23, 1984.
EQT025 (Tank, Methanol)	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) – Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Tank is an affected source under another NESHAP Subparts (F & G). [40 CFR 63.2338(c)(1)]
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. No construction, reconstruction, or modification after July 23, 1984.
EQT027 (Tank, Ethyl Acrylate)	NESHAP Subpart F & G – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater [40 CFR 63.100 & 110]	DOES NOT APPLY. This is an intervening storage vessel between CMPU and storage vessel that is located in a tank farm. [40 CFR 63.100(g)(3)(i)]

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No.	Requirement	Notes
EQT027 (Tank, Ethyl Acrylate)	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. Construction, reconstruction, or modification commenced prior to July 23, 1984.
(continued)	Control of Emissions of Organic Compounds: Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Vapor pressure of material stored is less than 1.5 psia ($VP_{max} = 1.017$ psia).
EQT030 (Tank)	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non Gasoline) (OLD) – Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Storage tank subject to SOCMII HON; therefore, OLD not applicable per 40 CFR 63.2338(c)(1). [40 CFR 63.2338(c)(1)]
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. No construction, reconstruction, or modification after July 23, 1984. [40 CFR 60.110b(a)]
	Control of Emissions of Organic Compounds: Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Vapor pressure of material stored is less than 1.5 psia.
	NESHAP Subpart F – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater [40 CFR 63.100]	DOES NOT APPLY. Tank does not meet the definition of storage vessel per 40 CFR 63.101. Tank stores organic HAPs only as impurities. [40 CFR 63.100(f)(8)]
EQTs 033, 050, 051 (Tanks)	NESHAP Subpart F & G – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater [40 CFR 63.100 & 110]	DOES NOT APPLY. Tanks do not meet the definition of storage vessel per 40 CFR 63.101. Tanks store organic HAPs only as impurities.
	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) – Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Does not meet the definition of an organic liquid per 40 CFR 63.2406.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles Agency Interest No. 227637 Vopak Industrial Infrastructure Americas St. Charles, LLC Taft, St. Charles Parish, Louisiana

X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No.	Requirement	Notes
EQTs 033, 050, 051 (continued)	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. No construction, reconstruction, or modification after July 23, 1984.
	Control of Emissions of Organic Compounds: Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Vapor pressure of material stored is less than 1.5 psia.
EQT034 (Tank)	NESHAP Subpart F & G – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater [40 CFR 63.100 & 110]	DOES NOT APPLY. Tank does not meet the definition of storage vessel per 40 CFR 63.101. Tank stores organic HAPs only as impurities.
	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) – Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Does not meet the definition of an organic liquid per 40 CFR 63.2406. The annual average HAP true vapor pressure is < 0.1 psia.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. Tank capacity is > 39,891 gals (151 m ³) and VOC vapor pressure of material stored is < 0.5 psia.
	Control of Emissions of Organic Compounds: Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Vapor pressure of material stored is less than 1.5 psia.
EQT035 (Tank)	NESHAP Subpart F & G – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater [40 CFR 63.100 & 110]	DOES NOT APPLY. Tank supports HON units, but does not meet the definition of a storage vessel per 40 CFR 63.101. Tank stores HAPs only as impurities.
	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) – Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Does not meet the definition of an organic liquid per 40 CFR 63.2406. The annual average HAP true vapor pressure is < 0.1 psia.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No.	Requirement	Notes
EQT035 (Tank) (continued)	NESHAP for Miscellaneous Organic Chemical Manufacturing (MON) [40 CFR 63 Subpart FFFF]	DOES NOT APPLY. Tank stores organic liquid that contains HAP as impurities. [40 CFR 63.2550(i)]
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. Construction, reconstruction, or modification commenced prior to July 23, 1984.
	Control of Emissions of Organic Compounds: Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Vapor pressure of material stored is less than 1.5 psia.
EQT036 (Tank)	NESHAP Subpart FFFF – National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing – Storage Tanks [40 CFR 63.2430]	DOES NOT APPLY. Does not meet the definition of a storage vessel per 63.2550. Tank stores organic HAPs only as impurities. Tank supports the LP-3 Unit.
	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) – Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Does not meet the definition of an organic liquid per 40 CFR 63.2406. The annual average HAP true vapor pressure is < 0.1 psia.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. Construction, reconstruction, or modification commenced prior to July 23, 1984.
EQTs 037, 038, 041, 042, 048, 049 (EFR Tanks)	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) – Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Storage tanks are subject to NESHAP Subpart YY; therefore, OLD is not applicable as per 40 CFR 63.2338(c)(1).
	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110]	DOES NOT APPLY. Storage vessels were constructed, reconstructed, or modified prior to June 11, 1973. Tanks store Dripolene and Wastewater (4% dripolene).

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No.	Requirement	Notes
EQTs 037, 038, 041, 042, 048, 049 (continued)	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	The permittee has chosen an alternative for compliance with NESHAP Subpart FF standards for tanks, specified under 40 CFR 61.351(a)(2). The alternative is compliance with an external floating roof meeting the requirements of NSPS Subpart Kb. [40 CFR 60.112b]
EQT039 (Tank)	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) – Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Does not meet the definition of an organic liquid per 40 CFR 63.2406. The annual average HAP true vapor pressure is < 0.1 psia.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. Construction, reconstruction, or modification commenced prior to July 23, 1984.
EQT040 (Tank, Isopropyl ether)	NESHAP Subpart F & G – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater [40 CFR 63.100 & 110]	DOES NOT APPLY. Tank does not store organic HAPs. Tank is not a storage vessel per 40 CFR 63.101.
	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) – Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Does not meet the definition of an organic liquid per 40 CFR 63.2406.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. Construction, reconstruction, or modification commenced prior to July 23, 1984.
EQTs 045, 046 (Docks)	NESHAP Subpart Y - National Emission Standards for Marine Tank Vessel Loading Operations [40 CFR 63.560]	EXEMPT from MACT and RACT standards per 40 CFR 63.560(a)(2). Recordkeeping requirements of 40 CFR 63.567(j)(4), emission estimation requirements of 40 CFR 63.565(l), and submerged fill standards of 46 CFR 153.282 apply.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles Agency Interest No. 227637 Vopak Industrial Infrastructure Americas St. Charles, LLC Taft, St. Charles Parish, Louisiana

X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No.	Requirement	Notes
EQTs 053, 071 (Tanks)	NESHAP Subpart F & G – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater [40 CFR 63.100 & 110]	DOES NOT APPLY. Tanks do not support CMPU subject to SOCMH HON.
	NESHAP Subpart FFFF – National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing – Storage Tanks [40 CFR 63.2430]	DOES NOT APPLY. Does not meet the definition of a storage vessel per 40 CFR 63.2550. Tanks do not store organic HAPs.
	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) – Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Does not meet the definition of an organic liquid per 40 CFR 63.2406. The annual average HAP true vapor pressure is < 0.1 psia.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. Construction, reconstruction, or modification commenced prior to July 23, 1984.
	Control of Emissions of Organic Compounds: Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Vapor pressure of material stored is less than 1.5 psia.
EQT054 (TTU)	Compliance Assurance Monitoring [40 CFR 64]	EXEMPT per 40 CFR 64.2(b)(1)(vi). A continuous compliance determination method has been specified by this permit for applicable emission limitations/standards.
	Emission Standards for Sulfur Dioxide: Emission Limitations [LAC 33:III.1503]	DOES NOT APPLY. Potential to emit SO ₂ is less than 5 TPY.
	NESHAP Subpart Y - National Emission Standards for Marine Tank Vessel Loading Operations [40 CFR 63.560]	EXEMPT from MACT and RACT standards per 40 CFR 63.560(a)(2). Recordkeeping requirements of 40 CFR 63.567(j)(4), emission estimation requirements of 40 CFR 63.565(l), and submerged fill standards of 46 CFR 153.282 apply.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No.	Requirement	Notes
EQT055 (Tank)	NESHAP Subpart F – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater [40 CFR 63.100]	DOES NOT APPLY. Tank does not meet the definition of storage vessel per 40 CFR 63.101. Tank stores organic HAPs only as impurities. [40 CFR 63.100(f)(8)]
	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) -Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Does not meet the definition of an organic liquid per 40 CFR 63.2406. The annual average HAP true vapor pressure is < 0.1 psia.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. Tank capacity is > 19,814 gals (75 m ³) but < 39,891 gals (151 m ³) with max true vapor pressure less than 2.1 psia.
	Control of Emissions of Organic Compounds: Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Vapor pressure of material stored is less than 1.5 psia.
EQTs 056, 057, 058 (Scrubbers)	Compliance Assurance Monitoring [40 CFR 64]	DOES NOT APPLY. Each unit does not have potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.
EQTs 059, 076 (TTUs)	Compliance Assurance Monitoring [40 CFR 64]	EXEMPT per 40 CFR 64.2(b)(1)(i). Thermal treatment units are subject to monitoring under NESHAP Subpart EEEE, OLD MACT.
	Emission Standards for Sulfur Dioxide: Emission Limitations [LAC 33:III.1503]	DOES NOT APPLY. Potential to emit SO ₂ is less than 5 TPY.
	NESHAP Subpart F & G – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater [40 CFR 63.100 & 110]	DOES NOT APPLY. The control devices comply with monitoring, recordkeeping and recording of NESHAP Subpart EEEE (another 40 CFR 63 Subpart). [40 CFR 63.2396(e)]

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles
Agency Interest No. 227637
Vopak Industrial Infrastructure Americas St. Charles, LLC
Taft, St. Charles Parish, Louisiana

X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No.	Requirement	Notes
EQT060 (Tank)	NESHAP Subpart F & G – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater [40 CFR 63.100 & 110]	DOES NOT APPLY. Tank does not meet the definition of storage vessel per 40 CFR 63.101. Tank stores organic HAPs only as impurities.
	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) - Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Does not meet the definition of an organic liquid per 40 CFR 63.2406. The annual average HAP true vapor pressure is < 0.1 psia.
	NESHAP for Miscellaneous Organic Chemical Manufacturing (MON) [40 CFR 63 Subpart FFFF]	DOES NOT APPLY. Tank does not store organic HAP and/or hydrogen halide and halogen HAP. [40 CFR 63.2550(i)]
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. Tank capacity is > 39,891 gals (151 m ³) and VOC vapor pressure of material stored is < 0.5 psia.
	Control of Emissions of Organic Compounds: Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Vapor pressure of material stored is less than 1.5 psia.
EQTs 062, 063, 064, 065, 068 (Tanks)	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) - Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Does not meet the definition of an organic liquid per 40 CFR 63.2406. Tanks do not store HAPs.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. No construction, reconstruction, or modification after July 23, 1984.
	NESHAP Subpart YY – National Emission Standards for Hazardous Air Pollutants for Source Categories: Generic MACT Standards [40 CFR 63.1100]	DOES NOT APPLY. The tanks do not emit any organic HAPs as defined under 40 CFR 63.1103(e)(2) (list of HAPs included in table 1 to NESHAP Subpart XX).

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles Agency Interest No. 227637 Vopak Industrial Infrastructure Americas St. Charles, LLC Taft, St. Charles Parish, Louisiana

X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No.	Requirement	Notes
EQTs 066, 067 Tanks	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) -Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Tanks are affected sources under another NESHAP Subpart - 40 CFR 63 Subpart YY. [40 CFR 63.2338(c)(1)]
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. Tanks were not constructed, reconstructed, or modified after July 23, 1984.
EQT072 (Tank, Methyl Acrylate)	NESHAP Subpart F & G – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater [40 CFR 63.100 & 110]	DOES NOT APPLY. This is an intervening storage vessel between CMPIU and storage vessel that is located in a tank farm. [40 CFR 63.100(g)(3)(i)]
	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) - Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Tank does not contain organic liquids as defined in 40 CFR 63.2406. Either it contains less than 5% by weight of the listed HAP, or the material stored has an annual average true vapor pressure less than 0.1 psia. [40 CFR 63.2338(b)]
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. Construction, reconstruction, or modification commenced prior to July 23, 1984.
EQTs 073, 074, 075 (Tanks)	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 [40 CFR 60.110b]	DOES NOT APPLY. Tanks' capacities are greater than 151 m3 (39,891 gals), and VOC vapor pressure of material stored is less than 3.5 kPa (0.5 psi). [40 CFR 60.110b(b)]
	NESHAP Subpart F & G – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater [40 CFR 63.100 & 110]	DOES NOT APPLY. Tanks do not store organic HAPs. [40 CFR 63.100(f)(1)]
	NESHAP Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (OLD) (Non Gasoline) - Storage Tanks [40 CFR 63.2330]	DOES NOT APPLY. Tanks do not contain organic liquids as defined in 40 CFR 63.2406. [40 CFR 63.2338(b)]

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Vopak Terminal St. Charles Agency Interest No. 227637 Vopak Industrial Infrastructure Americas St. Charles, LLC Taft, St. Charles Parish, Louisiana

X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No.	Requirement	Notes
EQTs 073, 074, 075 (continued)	NESHAP Subpart FFFF – National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing - Storage Tanks [40 CFR 63.2430]	DOES NOT APPLY. Tanks do not store organic HAP and/or hydrogen halide and halogen HAPs. [40 CFR 63.2550(i)]
	Control of Emissions of Organic Compounds: Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Vapor pressure of VOC stored is less than 1.5 psia.
SCNs 001, 003, 006, 007 (Loading Scenarios)	VOC Loading [LAC 33:III.2107]	DOES NOT APPLY. Vapor pressure of the material loaded at the racks is less than 1.5 psia.
	Marine Vapor Recovery [LAC 33:III.2108]	EXEMPT. Vapor pressure of the material loaded at the dock is less than 1.5 psia.
SCN002 (Loading Scenario)	VOC Loading [LAC 33:III.2107]	DOES NOT APPLY. Vapor pressure of the material loaded at the racks is less than 1.5 psia.
	Marine Vapor Recovery [LAC 33:III.2108]	EXEMPT. Vapor pressure of the material loaded at the dock is less than 1.5 psia.
	NESHAP Subpart F & G – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater [40 CFR 63.100 & 110]	DOES NOT APPLY. Materials loaded are acrylates that are non-HAPs.
SCNs 004, 005 (Loading Scenarios)	NESHAP Subpart Y - National Emission Standards for Marine Tank Vessel Loading Operations [40 CFR 63.560]	EXEMPT from MACT and RACT standards per 40 CFR 63.560(a)(2). Recordkeeping requirements of 40 CFR 63.567(j)(4), emission estimation requirements of 40 CFR 63.565(l), and submerged fill standards of 46 CFR 153.282 apply.

The above table provides explanation for both the exemption status and non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

APPENDIX A.

Project 2021 Products

Abietic Acid	Dodecane	Olive Oil
Acetic Acid	Dodecane, 1- (C-12 A O)	Palm Kernel Oil
Adiponitrile	Dowfroth/Frother (250)	Palm Oil
AEP HH	DST	Peanut Oil
ALFOL 10 Alcohol	Ethyl Hexanol, 2-	Petroleum Distillate
ALFOL 6 Alcohol	Ethyl Hexyl Acrylate, 2-	Phosphoric Acid
ALFOL 8 Alcohol	Ethylene Glycol	Piperazine
Alkyl Benzene	Exxate 1000 Solvent	Polybutene
Ammonium Nitrate	Exxate 600 Solvent	Polyethylene Glycol 400
Ammonium Sulfate	Fatty Acid	Polyglycols Rerun
Antifreeze Glycol	Fatty Oil	Potassium Chloride
Arcol (Polyol)	Fuel Oil #2	Propanediol, 1,3-
Aromatic 100	Fuel Oil #4	Propylene Glycol
Asphalt	Fuel Oil #6	Propylene Tetramer
Base Stock/Oil	Gas Oil	Rapeseed Oil
Biodiesel	H. O. Safflower	Refrigeration Oil
Butanediol, 1,2-	Heavy Aromatic Solvent	Residual Fuel Oil
Butanediol, 1,3-	Heptanol, 2-	Resin Oil
Butterfat	Hexadecane, 1- (C-16 or C-16/18 Olefin)	Resin Oil 90
Butyl Cellosolve	Isononyl Alcohol	Safflower Oil
Canola Oil	Isopar H	Sesame Oil
Carbon Black Oil	Jet Fuel/Kerosene	Solvent Neutral Oil
Castor Oil	Lard	Soybean Oil
Caustic Soda	Linseed	Spray Oil
Coconut Oil	Lube Oil Additives	SR Neutral Oil (325 and All)
Corn Oil	Lube Oils	Sulfuric Acid
Cottonseed Oil	MEA	Sunflower Oil
Crambe	MEG	Sunola Oil
Crude Glycol	Methoxytriglycol	Tall Oil
Crude Penta	Methyl 2 Pyrrolidone, n-	Tallow
DEA	Methyl Carbitol	TEG
Decant Oil	Mineral Oil	Tetradecene, 1- (C-14 A O)
DEG	Molasses	Tetralin
Diethyl Benzene, 1,4- (and o-, p-)	MPG Basic	Transformer Oil
Diethyl Benzene, (m-)	Nathenic Mineral Pale Oil	Triethylene Glycol
Diethylene Glycol	Neodene 1014	TTEG
Diethylene Glycol Monobutyl Ether	Neodol 23-6.5	UAN
Diethylene Glycol Monoethyl Ether	Neutral Oil 500	Urea
Diisopropyl Benzene, (o-)	Neutral Solvent 100	Vacuum Gas Oil
Diisopropyl Benzene, 1,3- (m-)	Neutral Solvent 150	Vegetable Oil
Diisopropyl Benzene, (p-)	Nonanol, 1-	White Oil
Dipropylene Glycol	Odorless Solvent	
Dipropylene Glycol Methyl Ether	Olefins C-10	

General Information

AI ID: 227637 Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

Also Known As:	ID	Name	User Group	Start Date
	2208900186	AFS (EPA Air Facility System)	AFS (EPA Air Facility System)	03-23-2022
	2520-00186	CDS Number	CDS Number	10-18-2021
	LAR000102279	Vopak Industrial Infrastructure Americas St. Charles LLC	Hazardous Waste Notification	01-19-2021

Physical Location:	Off River Rd (portion of) Taft, LA 70057	Main Phone: 2818329274
---------------------------	--	-------------------------------

Mailing Address: 2000 W Loop S Ste 1040
Houston, TX 77027

Location of Front Gate: 29.984183 latitude, -90.441131 longitude, Coordinate Method: Lat.\Long. - DMS, Coordinate Datum: NAD83

Related People:	Name	Mailing Address	Phone (Type)	Relationship
	Darren Duhe	355 LA Hwy 3142 Hahnville, LA 70057	9857834558 (WP)	HW-1 Notification Contact for
	Darren Duhe	355 LA Hwy 3142 Hahnville, LA 70057	darren.duhe@vopak	HW-1 Notification Contact for
	Frank Fazio	21255 Hwy 1, Bldg 11004T Plaquemine, LA 70764	frank.fazio@vopak.c	Emission Inventory Facility Contact for
	Frank Fazio	21255 Hwy 1, Bldg 11004T Plaquemine, LA 70764	3373460417 (WP)	Emission Inventory Facility Contact for
	John Clifton Ferrell	4415 E Greenwood St Baytown, TX 77520	clifton.ferrell@vopak	HW-1 Certifier for
	John Clifton Ferrell	4415 E Greenwood St Baytown, TX 77520	7135617135 (WP)	HW-1 Certifier for
	John Clifton Ferrell	4415 E Greenwood St Baytown, TX 77520	7135617135 (WP)	Responsible Official for
	John Clifton Ferrell	4415 E Greenwood St Baytown, TX 77520	clifton.ferrell@vopak	Responsible Official for

Related Organizations:	Name	Address	Phone (Type)	Relationship
	Union Carbide Corporation	P O Box 50 Hahnville, LA 70057	504-783-4294 (WP)	Property Owner
	Vopak Industrial Infrastructure Americas St. Charles LLC	21255 Hwy 1, Bldg 11004T Plaquemine, LA 70764	frank.fazio@vopak.c	Operates
	Vopak Industrial Infrastructure Americas St. Charles LLC	21255 Hwy 1, Bldg 11004T Plaquemine, LA 70764	3373460417 (WP)	Owns
	Vopak Industrial Infrastructure Americas St. Charles LLC	21255 Hwy 1, Bldg 11004T Plaquemine, LA 70764	frank.fazio@vopak.c	Air Billing Party for
	Vopak Industrial Infrastructure Americas St. Charles LLC	21255 Hwy 1, Bldg 11004T Plaquemine, LA 70764	3373460417 (WP)	Emission Inventory Billing Party
	Vopak Industrial Infrastructure Americas St. Charles LLC	21255 Hwy 1, Bldg 11004T Plaquemine, LA 70764	frank.fazio@vopak.c	Emission Inventory Billing Party
	Vopak Industrial Infrastructure Americas St. Charles LLC	21255 Hwy 1, Bldg 11004T Plaquemine, LA 70764	3373460417 (WP)	Air Billing Party for
	Vopak Industrial Infrastructure Americas St. Charles LLC	21255 Hwy 1, Bldg 11004T Plaquemine, LA 70764	3373460417 (WP)	Operates
	Vopak Industrial Infrastructure Americas St. Charles LLC	21255 Hwy 1, Bldg 11004T Plaquemine, LA 70764	frank.fazio@vopak.c	Owns

General Information

AI ID: 227637 Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

NAIC Codes: 493190, Other Warehousing and Storage

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Comments	Operating Time
Vopak Terminal St. Charles						
EQT 0001	607 - Tank 3101	10.18 million gallons		652.3 MM gallons/yr		8760 hr/yr
EQT 0002	499 - Tank 1200	4.01 million gallons		34.1 MM gallons/yr		8760 hr/yr
EQT 0003	500 - Tank 1117	1 million gallons		197 MM gallons/yr	antifreeze glycol	8760 hr/yr
EQT 0004	501 - Tank 1115	1 million gallons		29.086 MM gallons/yr	diethylene glycol	8760 hr/yr
EQT 0005	502 - Tank 1114	152819 gallons		14.757 MM gallons/yr	polyglycols rerun	8760 hr/yr
EQT 0006	503 - Tank 2239	255936 gallons		108 MM gallons/yr	ethylene glycol	8760 hr/yr
EQT 0007	504 - Tank 2238	255936 gallons		108 MM gallons/yr	Methoxytriglycol	8760 hr/yr
EQT 0008	505 - Tank 2313	169661 gallons		1.25 MM gallons/yr	tetralin	8760 hr/yr
EQT 0009	506 - Tank 2222	1.09 million gallons		20.7 MM gallons/yr	Crude Glycol	8760 hr/yr
EQT 0010	511 - Tank 1116	1.52 million gallons		12.9 MM gallons/yr		8760 hr/yr
EQT 0011	513 - Tank 1119	2.62 million gallons		22.3 MM gallons/yr		8760 hr/yr
EQT 0012	514 - Tank 1310	1.73 million gallons	21.9 MM gallons/yr	10.9 MM gallons/yr	Quench Oil	8760 hr/yr
EQT 0013	515 - Tank 1320 (Internal Floating Roof)	1.73 million gallons		241.7 MM gallons/yr	n-butyl alcohol	8760 hr/yr
EQT 0014	516 - Tank 1321 (External Floating Roof)	1.73 million gallons		88.2 MM gallons/yr	Dripolene and Wastewater (4% dripolene)	8760 hr/yr
EQT 0015	517 - Tank 1330	1.73 million gallons	21.9 MM gallons/yr	10.9 MM gallons/yr	Quench Oil	8760 hr/yr
EQT 0016	518 - Tank 1331 (External Floating Roof)	1.73 million gallons		88.2 MM gallons/yr	Dripolene and Wastewater (4% Dripolene)	8760 hr/yr
EQT 0017	519 - Tank 1341 (Internal Floating Roof)	1.73 million gallons		241.66 MM gallons/yr	n-Butyl alcohol	8760 hr/yr
EQT 0018	520 - Tank 2104	869340 gallons		49.2 MM gallons/yr	DST/Diethylene glycol	8760 hr/yr
EQT 0019	521 - Tank 2106	589587 gallons		12.3 MM gallons/yr	Methyl Carbitol	8760 hr/yr
EQT 0020	523 - Tank 2109	589587 gallons		12.3 MM gallons/yr	Methyl Carbitol	8760 hr/yr
EQT 0021	531 - Tank 2202	337823 gallons		14.52 MM gallons/yr	DEA	8760 hr/yr
EQT 0022	532 - Tank 2206	355754 gallons		1.763 MM gallons/yr	AEP HH	8760 hr/yr
EQT 0023	533 - Tank 2210	974623 gallons		20 MM gallons/yr	Methyl Acrylate	8760 hr/yr
EQT 0024	534 - Tank 2211	355754 gallons		4.7 MM gallons/yr	TTEG	8760 hr/yr
EQT 0025	536 - Tank 2220 (Internal Floating Roof)	908124 gallons		18 MM gallons/yr	Methanol	8760 hr/yr
EQT 0026	537 - Tank 2221	908116 gallons		14.1727 MM gallons/yr	TEG	8760 hr/yr
EQT 0027	538 - Tank 2230	856602 gallons		22.5 MM gallons/yr	Ethyl Acrylate	8760 hr/yr
EQT 0028	540 - Tank 2247	589544 gallons		40 MM gallons/yr	Diethylene Glycol	8760 hr/yr
EQT 0029	541 - Tank 2248	139517 gallons		90 MM gallons/yr	Ethylene glycol	8760 hr/yr
EQT 0030	542 - Tank 2249	138178 gallons		90 MM gallons/yr	Crude Penta (pentaethylene glycol crude)	8760 hr/yr

INVENTORIES

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles
Activity Number: PER20220001
Permit Number: 2520-00186-V1
Air - Title V Regular Permit Minor Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Comments	Operating Time
Vopak Terminal St. Charles						
EQT 0031	547 - Tank 2314	47001 gallons		1.96 MM gallons/yr	MPG Basic- (OHAP Vapor Pressure 0.0082 psi)	8760 hr/yr
EQT 0032	571 - Tank 2141 (Non-Venting Sphere)	867000 gallons			Hexene Tank	8760 hr/yr
EQT 0033	553 - Tank 2330	300810 gallons		41 MM gallons/yr	butyl acrylate	8760 hr/yr
EQT 0034	555 - Tank 2336	117504 gallons		27 MM gallons/yr	2-ethylhexanol	8760 hr/yr
EQT 0035	598 - Tank 1229	4.23 million gallons		50.9 MM gallons/yr	MEA	8760 hr/yr
EQT 0036	599 - Tank 1300 (Internal Floating Roof)	1.73 million gallons		36.1 MM gallons/yr	hexene	8760 hr/yr
EQT 0037	600 - Tank 1301 (External Floating Roof)	1.73 million gallons		88.2 MM gallons/yr	Dripolene and Wastewater (4% dripolene)	8760 hr/yr
EQT 0038	601 - Tank 1311 (External Floating Roof)	1.73 million gallons		88.2 MM gallons/yr	Dripolene and Wastewater (4% dripolene)	8760 hr/yr
EQT 0039	602 - Tank 2102 (Internal Floating Roof)	589585 gallons		6.61 MM gallons/yr	Methanol	8760 hr/yr
EQT 0040	603 - Tank 2205 (Internal Floating Roof)	300221 gallons		.5 MM gallons/yr	Isopropyl ether	8760 hr/yr
EQT 0041	606 - Tank 3100 (External Floating Roof)	10.12 million gallons		652.3 MM gallons/yr	Naphtha	8760 hr/yr
EQT 0042	608 - Tank 4101 (External Floating Roof)	10.12 million gallons		652.3 MM gallons/yr	Naphtha	8760 hr/yr
EQT 0043	617 - No. 1 T/C Rack			218.1 MM gallons/yr	When it is loading of acrylates, emissions are routed to TTU.	8760 hr/yr
EQT 0044	619 - No. 3 T/C Rack			129.5 MM gallons/yr		8760 hr/yr
EQT 0045	625 - No. 2 Dock			242 MM gallons/yr	When it is loading of acrylates, emissions are routed to TTU.	8760 hr/yr
EQT 0046	625A - No. 1 Dock		6000 gallons/hr	6000 gallons/hr		8760 hr/yr
EQT 0047	632 - Tank 1340 (Internal Floating Roof)	1.73 million gallons		241.66002 MM gallons/yr	n-butyl alcohol	8760 hr/yr
EQT 0048	633 - Tank 5101 (External Floating Roof)	14.3 million gallons		652.3 MM gallons/yr	Naphtha	8760 hr/yr
EQT 0049	634 - Tank 6200 (External Floating Roof)	5.78 million gallons		88.2 MM gallons/yr	Dripolene	8760 hr/yr
EQT 0050	637 - Tank 2337	548225 gallons		41.001469 MM gallons/yr	Butyl acrylate	8760 hr/yr
EQT 0051	638 - Tank 2350 Ethylhexyl Acrylate (EHA)	1.2 million gallons		41.226913 MM gallons/yr	Ethyl Hexyl Acrylate (EHA)	8760 hr/yr
EQT 0052	639 - Tank 2231	1.36 million gallons		11.5 MM gallons/yr		8760 hr/yr
EQT 0053	640 - Tank 2307	406067 gallons		4.028 MM gallons/yr	Amine DCT	8760 hr/yr
EQT 0054	668 - No. 1 Dock Thermal Treatment Unit			66709 MM BTU/yr		8760 hr/yr
EQT 0055	3402 - Tank 2204	31857 gallons		2.9 MM gallons/yr	Crude penta	8760 hr/yr
EQT 0056	3407 - Overland Amines Scrubber		60000 gallons/hr	265.579816 MM gallons/yr		8760 hr/yr
EQT 0057	3409 - No. 2 Dock Amines Scrubber		60000 gallons/hr	144.99425 MM gallons/yr		8760 hr/yr
EQT 0058	3410 - EDA Scrubber			115 gallons/min		8760 hr/yr

INVENTORIES

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Comments	Operating Time
Vopak Terminal St. Charles						
EQT 0059	3414 - Acrylate Thermal Treatment Unit			79862 MM BTU/yr		8760 hr/yr
EQT 0060	3415 - Tank 1230	612933 gallons		50.892783 MM gallons/yr	MEA	8760 hr/yr
EQT 0061	3416 - No. 1 T/T Rack			231.7 MM gallons/yr	When it is loading of acrylates, emissions are routed to TTU.	8760 hr/yr
EQT 0062	572 - Tank 2142 (vents to UCC Olefins 1 & 2 flares)	163500 gallons			Butane / Propane Tank (vents back to Olefins 1 & 2 flares)	8760 hr/yr
EQT 0063	573 - Tank 2143 (vents to UCC Olefins 1 & 2 flares)	163500 gallons			Butane / Propane Tank (vents back to Olefins 1 & 2 flares)	8760 hr/yr
EQT 0064	574 - Tank 2144 (vents to UCC Olefins 1 & 2 flares)	163500 gallons			Propylene Tank (vents back to Olefins 1 & 2 flares)	8760 hr/yr
EQT 0065	575 - Tank 2145 (vents to UCC Olefins 1 & 2 flares)	163500 gallons			Propylene Tank (vents back to process at Olefins Unit)	8760 hr/yr
EQT 0066	635 - Tank 6220 (vents to UCC Olefins 1 & 2 flares)	1.08 million gallons			Crude Butadiene (vents back to process at Olefins Unit)	8760 hr/yr
EQT 0067	635A - Tank 6210 (vents to UCC Olefins 1 & 2 flares)	865000 gallons			Crude Butadiene Tank (vents back to process at Olefins Unit)	8760 hr/yr
EQT 0068	636 - Tank 6230 (vents to UCC Olefins 1 & 2 flares)	1.49 million gallons			Propylene Tank (vents back to process at Olefins Unit)	8760 hr/yr
EQT 0069	586 - Tank 2339 (Non-Venting Bullet)	80500 gallons			Ammonia Tank (non-venting bullet)	8760 hr/yr
EQT 0070	587 - Tank 2340 (Non-Venting Bullet)	80500 gallons			Ammonia Tank (non-venting bullet)	8760 hr/yr
EQT 0071	3420 - Tank 2326	230294 gallons		4.3 MM gallons/yr	Piperazine (DEDA-Diethylenediamine)	8760 hr/yr
EQT 0072	552 - Tank 2320	676821 gallons		22.5 MM gallons/yr	Methyl Acrylate	8760 hr/yr
EQT 0073	3425 - Tank 2302	433137 gallons		31.152 MM gallons/yr	Diethylenetriamine (DETA)	8760 hr/yr
EQT 0074	3426 - Tank 2315	88930 gallons		4.653 MM gallons/yr	Aminoethylethanolamine (AEEA)	8760 hr/yr
EQT 0075	3424 - Tank 2301-Ethylenediamine (EDA)	1.03 million gallons		27.143 MM gallons/yr	Ethylenediamine (EDA)	8760 hr/yr
EQT 0076	3427 - Acrylate Thermal Treatment Unit			79862 MM BTU/yr		8760 hr/yr
FUG 0001	- Equipment Fugitive Emissions					8760 hr/yr

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Vopak Terminal St. Charles							
EQT 0001	607 - Tank 3101	16.5	381	.7		32	68
EQT 0002	499 - Tank 1200			.7		32	68.22
EQT 0003	500 - Tank 1117	30	625	.7		32	68.22
EQT 0004	501 - Tank 1115	31	651	.7		32	68.22

INVENTORIES

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles
Activity Number: PER20220001
Permit Number: 2520-00186-V1
Air - Title V Regular Permit Minor Mod

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Vopak Terminal St. Charles							
EQT 0005	502 - Tank 1114	111	1302	.5		19	68.22
EQT 0006	503 - Tank 2239	19	228	.5		22	68.22
EQT 0007	504 - Tank 2238	29	337	.5		22	68.22
EQT 0008	505 - Tank 2313	11	132	.5		20	68.22
EQT 0009	506 - Tank 2222	24	501	.67		32	68.22
EQT 0010	511 - Tank 1116			.7		32	68.22
EQT 0011	513 - Tank 1119			.7		32	68.22
EQT 0012	514 - Tank 1310			.7		32	68.22
EQT 0013	515 - Tank 1320 (Internal Floating Roof)			96		32	68.22
EQT 0014	516 - Tank 1321 (External Floating Roof)			96		32	68
EQT 0015	517 - Tank 1330	.01	.13	.7		32	68.22
EQT 0016	518 - Tank 1331 (External Floating Roof)			96		32	68
EQT 0017	519 - Tank 1341 (Internal Floating Roof)			.33		32	68
EQT 0018	520 - Tank 2104			.7		32	68.22
EQT 0019	521 - Tank 2106			.7		32	68.22
EQT 0020	523 - Tank 2109		.13	.7		32	68.22
EQT 0021	531 - Tank 2202			.5		23	72.54
EQT 0022	532 - Tank 2206			.7		32	68.22
EQT 0023	533 - Tank 2210			.7		32	68.22
EQT 0024	534 - Tank 2211	13	434	.83		32	68.22
EQT 0025	536 - Tank 2220 (Internal Floating Roof)			.7		32	68.22
EQT 0026	537 - Tank 2221	89	4193	1		32	68.22
EQT 0027	538 - Tank 2230			.7		32	68.22
EQT 0028	540 - Tank 2247			.7		32	68.22
EQT 0029	541 - Tank 2248			.7		30	68.22
EQT 0030	542 - Tank 2249			.7		30	68.22
EQT 0031	547 - Tank 2314	.01	.84	.7		20	122
EQT 0033	553 - Tank 2330			.7		32	68.22
EQT 0034	555 - Tank 2336			.7		32	95
EQT 0035	598 - Tank 1229		.01	.5		32	68.22
EQT 0036	599 - Tank 1300 (Internal Floating Roof)			.5		32	70
EQT 0037	600 - Tank 1301 (External Floating Roof)			96		32	68.22

INVENTORIES

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Vopak Terminal St. Charles							
EQT 0038	601 - Tank 1311 (External Floating Roof)			96		32	68.22
EQT 0039	602 - Tank 2102 (Internal Floating Roof)			.7		32	70
EQT 0040	603 - Tank 2205 (Internal Floating Roof)	4	125.3	.8		32	68.22
EQT 0041	606 - Tank 3100 (External Floating Roof)			232		33	68.22
EQT 0042	608 - Tank 4101 (External Floating Roof)			.3		33	68.22
EQT 0043	617 - No. 1 T/C Rack			1.6			68.22
EQT 0044	619 - No. 3 T/C Rack			1.6		20	72
EQT 0047	632 - Tank 1340 (Internal Floating Roof)			.7		32	68.22
EQT 0048	633 - Tank 5101 (External Floating Roof)			260		32	68.22
EQT 0049	634 - Tank 6200 (External Floating Roof)			165		32	68.22
EQT 0050	637 - Tank 2337			.7		32	86
EQT 0051	638 - Tank 2350 Ethylhexyl Acrylate (EHA)			.7		32	68.22
EQT 0052	639 - Tank 2231		.14	.7		32	68.22
EQT 0053	640 - Tank 2307			.6		30	68.22
EQT 0054	668 - No. 1 Dock Thermal Treatment Unit	203	1842	/		47	1500
EQT 0055	3402 - Tank 2204			.7		41	68.22
EQT 0056	3407 - Overland Amines Scrubber	133.6	66.8	.5		38	131
EQT 0057	3409 - No. 2 Dock Amines Scrubber	268	134	.5		11	77
EQT 0058	3410 - EDA Scrubber	8.49	400	1		15	68.22
EQT 0060	3415 - Tank 1230	43	504	.5		32	120
EQT 0061	3416 - No. 1 T/T Rack					1.6	68.22
EQT 0062	572 - Tank 2142 (vents to UCC Olefins 1 & 2 flares)		.05	.3		13	70
EQT 0063	573 - Tank 2143 (vents to UCC Olefins 1 & 2 flares)		.05	.3		13	70
EQT 0064	574 - Tank 2144 (vents to UCC Olefins 1 & 2 flares)		.05	.3		13	70
EQT 0065	575 - Tank 2145 (vents to UCC Olefins 1 & 2 flares)		.05	.3		13	70
EQT 0066	635 - Tank 6220 (vents to UCC Olefins 1 & 2 flares)					65	70
EQT 0067	635A - Tank 6210 (vents to UCC Olefins 1 & 2 flares)					60	70
EQT 0068	636 - Tank 6230 (vents to UCC Olefins 1 & 2 flares)					72	41
EQT 0071	3420 - Tank 2326	13	264	.67		32	68.22
EQT 0073	3425 - Tank 2302			.7		32	68.22
EQT 0074	3426 - Tank 2315			.7		18	68.22
FUG 0001	- Equipment Fugitive Emissions						70

INVENTORIES

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

Relationships:

ID	Description	Relationship	ID	Description
EQT 0043	617 - No. 1 T/C Rack	Vents to	EQT 0059	3414 - Acrylate Thermal Treatment Unit
EQT 0043	617 - No. 1 T/C Rack	Vents to	EQT 0076	3427 - Acrylate Thermal Treatment Unit
EQT 0045	625 - No. 2 Dock	Vents to	EQT 0076	3427 - Acrylate Thermal Treatment Unit
EQT 0045	625 - No. 2 Dock	Vents to	EQT 0059	3414 - Acrylate Thermal Treatment Unit
EQT 0054	668 - No. 1 Dock Thermal Treatment Unit	Controls emissions from	EQT 0046	625A - No. 1 Dock
EQT 0058	3410 - EDA Scrubber	Controls emissions from	EQT 0075	3424 - Tank 2301-Ethylenediamine (EDA)
EQT 0059	3414 - Acrylate Thermal Treatment Unit	Controls emissions from	EQT 0023	533 - Tank 2210
EQT 0059	3414 - Acrylate Thermal Treatment Unit	Controls emissions from	EQT 0027	538 - Tank 2230
EQT 0059	3414 - Acrylate Thermal Treatment Unit	Controls emissions from	EQT 0033	553 - Tank 2330
EQT 0059	3414 - Acrylate Thermal Treatment Unit	Controls emissions from	EQT 0034	555 - Tank 2336
EQT 0059	3414 - Acrylate Thermal Treatment Unit	Controls emissions from	EQT 0050	637 - Tank 2337
EQT 0059	3414 - Acrylate Thermal Treatment Unit	Controls emissions from	EQT 0051	638 - Tank 2350 Ethylhexyl Acrylate (EHA)
EQT 0059	3414 - Acrylate Thermal Treatment Unit	Controls emissions from	EQT 0072	552 - Tank 2320
EQT 0061	3416 - No. 1 T/T Rack	Vents to	EQT 0059	3414 - Acrylate Thermal Treatment Unit
EQT 0061	3416 - No. 1 T/T Rack	Vents to	EQT 0076	3427 - Acrylate Thermal Treatment Unit
EQT 0076	3427 - Acrylate Thermal Treatment Unit	Controls emissions from	EQT 0023	533 - Tank 2210
EQT 0076	3427 - Acrylate Thermal Treatment Unit	Controls emissions from	EQT 0027	538 - Tank 2230
EQT 0076	3427 - Acrylate Thermal Treatment Unit	Controls emissions from	EQT 0033	553 - Tank 2330
EQT 0076	3427 - Acrylate Thermal Treatment Unit	Controls emissions from	EQT 0034	555 - Tank 2336
EQT 0076	3427 - Acrylate Thermal Treatment Unit	Controls emissions from	EQT 0050	637 - Tank 2337
EQT 0076	3427 - Acrylate Thermal Treatment Unit	Controls emissions from	EQT 0051	638 - Tank 2350 Ethylhexyl Acrylate (EHA)
EQT 0076	3427 - Acrylate Thermal Treatment Unit	Controls emissions from	EQT 0072	552 - Tank 2320

Subject Item Groups:

ID	Group Type	Group Description
CRG 0001	Common Requirements Group	- HON Group 2 Tanks
CRG 0003	Common Requirements Group	- EFR Tanks
CRG 0004	Common Requirements Group	- LAC_2103_B Tanks
CRG 0005	Common Requirements Group	- Fixed Roof Tanks
GRP 0001	Equipment Group	3400 - Transfer Operations Cap
GRP 0002	Equipment Group	3428 - Quench Oil Tank Cap
GRP 0003	Equipment Group	3429 - Tank Emission Cap
GRP 0004	Equipment Group	3430 - Loading Emission Cap
SCN 0001	Alternate Operating Scenario	- Group 2 Transfer Operations
SCN 0002	Alternate Operating Scenario	- Acrylates (Non-TAP) Loading
SCN 0003	Alternate Operating Scenario	- Ethyl Acrylate Loading

INVENTORIES

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

Subject Item Groups:

ID	Group Type	Group Description
SCN 0004	Alternate Operating Scenario	- Dripolene Dock Loading
SCN 0005	Alternate Operating Scenario	- Crude Butadiene/Propylene Dock Loading
SCN 0006	Alternate Operating Scenario	- Amines Loading
SCN 0007	Alternate Operating Scenario	- Other Loading Operations
UNF 0002	Unit or Facility Wide	- Vopak Terminal St. Charles

Group Membership:

ID	Description	Member of Groups
EQT 0002	499 - Tank 1200	GRP0000000003
EQT 0003	500 - Tank 1117	CRG0000000001
EQT 0006	503 - Tank 2239	CRG0000000001
EQT 0007	504 - Tank 2238	CRG0000000001
EQT 0008	505 - Tank 2313	CRG0000000001
EQT 0009	506 - Tank 2222	CRG0000000001
EQT 0010	511 - Tank 1116	GRP0000000003
EQT 0011	513 - Tank 1119	GRP0000000003
EQT 0012	514 - Tank 1310	GRP0000000002
EQT 0014	516 - Tank 1321 (External Floating Roof)	CRG0000000003
EQT 0015	517 - Tank 1330	GRP0000000002
EQT 0016	518 - Tank 1331 (External Floating Roof)	CRG0000000003
EQT 0018	520 - Tank 2104	CRG0000000005
EQT 0019	521 - Tank 2106	CRG0000000001
EQT 0020	523 - Tank 2109	CRG0000000001
EQT 0021	531 - Tank 2202	CRG0000000001
EQT 0023	533 - Tank 2210	CRG0000000004
EQT 0024	534 - Tank 2211	CRG0000000005
EQT 0026	537 - Tank 2221	CRG0000000005
EQT 0028	540 - Tank 2247	CRG0000000001
EQT 0029	541 - Tank 2248	CRG0000000001
EQT 0030	542 - Tank 2249	CRG0000000001
EQT 0031	547 - Tank 2314	CRG0000000001
EQT 0037	600 - Tank 1301 (External Floating Roof)	CRG0000000003
EQT 0038	601 - Tank 1311 (External Floating Roof)	CRG0000000003
EQT 0041	606 - Tank 3100 (External Floating Roof)	CRG0000000003
EQT 0042	608 - Tank 4101 (External Floating Roof)	CRG0000000003
EQT 0043	617 - No. 1 T/C Rack	GRP0000000001, GRP0000000004, SCN0000000001, SCN0000000002, SCN0000000003, SCN0000000006, SCN0000000007
EQT 0044	619 - No. 3 T/C Rack	GRP0000000001, GRP0000000004, SCN0000000001, SCN0000000007
EQT 0045	625 - No. 2 Dock	GRP0000000001, GRP0000000004, SCN0000000001, SCN0000000002, SCN0000000003, SCN0000000006, SCN0000000007

INVENTORIES

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

Group Membership:

ID	Description	Member of Groups
EQT 0046	625A - No. 1 Dock	GRP0000000001, SCN0000000004, SCN0000000005
EQT 0048	633 - Tank 5101 (External Floating Roof)	CRG0000000003
EQT 0049	634 - Tank 6200 (External Floating Roof)	CRG0000000003
EQT 0052	639 - Tank 2231	GRP0000000003
EQT 0061	3416 - No. 1 T/T Rack	GRP0000000001, GRP0000000004, SCN0000000001, SCN0000000002, SCN0000000003, SCN0000000006, SCN0000000007
EQT 0062	572 - Tank 2142 (vents to UCC Olefins 1 & 2 flares)	CRG0000000004
EQT 0063	573 - Tank 2143 (vents to UCC Olefins 1 & 2 flares)	CRG0000000004
EQT 0064	574 - Tank 2144 (vents to UCC Olefins 1 & 2 flares)	CRG0000000004
EQT 0065	575 - Tank 2145 (vents to UCC Olefins 1 & 2 flares)	CRG0000000004
EQT 0068	636 - Tank 6230 (vents to UCC Olefins 1 & 2 flares)	CRG0000000004
EQT 0072	552 - Tank 2320	CRG0000000004

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
1340	1340 B) Petroleum, Chemical Bulk Storage and Terminal (1,000,000 - 3,000,000 BBL Capacity)		

SIC Codes:

4226	Special warehousing and storage, nec	AI 227637
------	--------------------------------------	-----------

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO2e

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

Subject Item	PM10			PM2.5			SO2			NOx		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Vopak Terminal St. Charles												
EQT 0001 607												
EQT 0003 500												
EQT 0004 501												
EQT 0005 502												
EQT 0006 503												
EQT 0007 504												
EQT 0008 505												
EQT 0009 506												
EQT 0013 515												
EQT 0014 516												
EQT 0016 518												
EQT 0017 519												
EQT 0018 520												
EQT 0019 521												
EQT 0020 523												
EQT 0021 531												
EQT 0022 532												
EQT 0024 534												
EQT 0025 536												
EQT 0026 537												
EQT 0028 540												
EQT 0029 541												
EQT 0030 542												

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO₂e

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

Subject Item	CO			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Vopak Terminal St. Charles						
EQT 0001 607				4.66		20.42
EQT 0003 500				0.03		0.12
EQT 0004 501				<0.01		<0.01
EQT 0005 502				<0.01		<0.01
EQT 0006 503				0.01		0.05
EQT 0007 504				<0.01		0.02
EQT 0008 505				0.01		0.05
EQT 0009 506				0.01		0.06
EQT 0013 515				0.09		0.39
EQT 0014 516				1.85		8.12
EQT 0016 518				1.85		8.12
EQT 0017 519				0.09		0.40
EQT 0018 520				<0.01		0.02
EQT 0019 521				0.02		0.09
EQT 0020 523				0.02		0.09
EQT 0021 531				<0.01		0.01
EQT 0022 532				0.28		1.23
EQT 0024 534				0.01		0.05
EQT 0025 536				0.05		0.23
EQT 0026 537				0.01		0.03
EQT 0028 540				<0.01		<0.01
EQT 0029 541				0.01		0.03
EQT 0030 542				<0.01		<0.01

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO2e

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

Subject Item	PM10			PM2.5			SO2			NOx		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Vopak Terminal St. Charles												
EQT 0031 547												
EQT 0035 598												
EQT 0036 599												
EQT 0037 600												
EQT 0038 601												
EQT 0039 602												
EQT 0040 603												
EQT 0041 606												
EQT 0042 608												
EQT 0043 617												
EQT 0044 619												
EQT 0045 625												
EQT 0047 632												
EQT 0048 633												
EQT 0049 634												
EQT 0053 640												
EQT 0054 668	0.04	0.15	0.18	0.04	0.15	0.18	<0.01	0.01	0.01	0.55	2.01	2.41
EQT 0055 3402												
EQT 0056 3407												
EQT 0057 3409												
EQT 0058 3410												
EQT 0059 3414	0.06	0.17	0.25	0.06	0.17	0.25	<0.01	0.01	0.02	0.75	2.25	3.28
EQT 0060 3415												

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO2e

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

Subject Item	CO			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Vopak Terminal St. Charles						
EQT 0031 547				<0.01		<0.01
EQT 0035 598				0.14		0.61
EQT 0036 599				0.49		2.16
EQT 0037 600				1.85		8.12
EQT 0038 601				1.85		8.12
EQT 0039 602				0.12		0.52
EQT 0040 603				0.34		1.47
EQT 0041 606				5.88		25.76
EQT 0042 608				5.88		25.76
EQT 0043 617					38.28	
EQT 0044 619					35.26	
EQT 0045 625					101.02	
EQT 0047 632				0.09		0.40
EQT 0048 633				6.46		28.27
EQT 0049 634				2.50		10.95
EQT 0053 640				0.40		1.75
EQT 0054 668	0.46	1.69	2.02	6.14	47.34	26.88
EQT 0055 3402				<0.01		<0.01
EQT 0056 3407					54.40	
EQT 0057 3409					9.02	
EQT 0058 3410				0.47		2.04
EQT 0059 3414	0.63	1.89	2.75	1.06	37.78	4.65
EQT 0060 3415				0.29		1.26

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO2e

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

Subject Item	PM10			PM2.5			SO2			NOx		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Vopak Terminal St. Charles												
EQT 0061 3416												
EQT 0071 3420												
EQT 0073 3425												
EQT 0074 3426												
EQT 0076 3427	0.06	0.17	0.25	0.06	0.17	0.25	<0.01	0.01	0.02	0.75	2.25	3.28
FUG 0001												
GRP 0001 3400												
GRP 0002 3428												
GRP 0003 3429												
GRP 0004 3430												

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO2e

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

Subject Item	CO			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Vopak Terminal St. Charles						
EQT 0061 3416					31.81	
EQT 0071 3420				0.49		2.14
EQT 0073 3425				0.96		4.19
EQT 0074 3426				0.19		0.83
EQT 0076 3427	0.63	1.89	2.75	1.06	37.78	4.65
FUG 0001				1.74		7.60
GRP 0001 3400				7.00		30.66
GRP 0002 3428				1.84		8.06
GRP 0003 3429				5.39		23.62
GRP 0004 3430				2.47		10.83

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0001 607	2,2,4-Trimethylpentane	<0.01		0.02
	Benzene	0.15		0.68
	Ethyl benzene	<0.01		<0.01
	n-Hexane	0.36		1.58
	Toluene	0.02		0.10
	Xylene (mixed isomers)	<0.01		0.02
EQT 0003 500	Acetaldehyde	<0.01		0.01
	Ethylene glycol	0.03		0.11
	Methanol	<0.01		<0.01
EQT 0006 503	Acetaldehyde	<0.01		<0.01
	Ethylene glycol	0.01		0.04
EQT 0007 504	Glycol ethers (Table 51.3)	<0.01		0.02
EQT 0008 505	Naphthalene	<0.01		<0.01
EQT 0009 506	Acetaldehyde	<0.01		<0.01
	Ethylene glycol	0.01		0.05
	Methanol	<0.01		<0.01
EQT 0013 515	n-butyl alcohol	0.09		0.39
EQT 0014 516	1,3-Butadiene	0.053		0.234
	2,2,4-Trimethylpentane	<0.01		<0.01
	Acetaldehyde	<0.01		<0.01
	Benzene	0.18		0.78
	Ethyl benzene	<0.01		<0.01
	n-Hexane	0.01		0.05
	Naphthalene	<0.01		<0.01
	Styrene	<0.01		0.01
	Toluene	0.03		0.12
	Xylene (mixed isomers)	<0.01		0.01
EQT 0016 518	1,3-Butadiene	0.053		0.234
	2,2,4-Trimethylpentane	<0.01		<0.01
	Acetaldehyde	<0.01		<0.01
	Benzene	0.18		0.78
	Ethyl benzene	<0.01		<0.01
	n-Hexane	0.01		0.05
	Naphthalene	<0.01		<0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0016 518	Styrene	<0.01		0.01
	Toluene	0.03		0.12
	Xylene (mixed isomers)	<0.01		0.01
EQT 0017 519	n-butyl alcohol	0.09		0.40
EQT 0018 520	1,4-Dioxane	<0.01		<0.01
	Acetaldehyde	<0.01		0.01
	Ethylene glycol	<0.01		<0.01
	Formaldehyde	<0.01		0.01
	Methyl Cellosolve Acetate	<0.01		<0.01
EQT 0019 521	Glycol ethers (Table 51.3)	0.02		0.09
EQT 0020 523	Glycol ethers (Table 51.3)	0.02		0.09
EQT 0021 531	Diethanolamine	<0.01		0.01
EQT 0024 534	Acetaldehyde	0.01		0.05
	Formaldehyde	<0.01		<0.01
EQT 0025 536	Methanol	0.05		0.23
EQT 0026 537	Acetaldehyde	0.01		0.03
EQT 0028 540	Glycol ethers (Table 51.3)	<0.01		<0.01
EQT 0029 541	Acetaldehyde	<0.01		<0.01
	Ethylene glycol	0.01		0.03
EQT 0036 599	Benzene	<0.01		<0.01
	n-Hexane	<0.01		<0.01
EQT 0037 600	1,3-Butadiene	0.053		0.234
	2,2,4-Trimethylpentane	<0.01		<0.01
	Acetaldehyde	<0.01		<0.01
	Benzene	0.18		0.78
	Ethyl benzene	<0.01		<0.01
	n-Hexane	0.01		0.05
	Naphthalene	<0.01		<0.01
	Styrene	<0.01		0.01
	Toluene	0.03		0.12
	Xylene (mixed isomers)	<0.01		0.01
EQT 0038 601	1,3-Butadiene	0.053		0.234
	2,2,4-Trimethylpentane	<0.01		<0.01
	Acetaldehyde	<0.01		<0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles****Activity Number: PER20220001****Permit Number: 2520-00186-V1****Air - Title V Regular Permit Minor Mod**

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0038 601	Benzene	0.18		0.78
	Ethyl benzene	<0.01		<0.01
	n-Hexane	0.01		0.05
	Naphthalene	<0.01		<0.01
	Styrene	<0.01		0.01
	Toluene	0.03		0.12
	Xylene (mixed isomers)	<0.01		0.01
EQT 0039 602	Methanol	0.12		0.52
EQT 0041 606	2,2,4-Trimethylpentane	0.01		0.02
	Benzene	0.19		0.85
	Ethyl benzene	<0.01		<0.01
	n-Hexane	0.46		2.00
	Toluene	0.03		0.12
	Xylene (mixed isomers)	0.01		0.02
	2,2,4-Trimethylpentane	<0.01		0.02
EQT 0042 608	Benzene	0.19		0.85
	Ethyl benzene	<0.01		<0.01
	n-Hexane	0.46		2.00
	Toluene	0.03		0.12
	Xylene (mixed isomers)	0.01		0.02
	1,4-Dioxane		<0.01	
	1-Methylnaphthalene		0.09	
EQT 0043 617	2,2,4-Trimethylpentane		0.05	
	Acetaldehyde		0.56	
	Acrylic acid		<0.01	
	Antimony (and compounds)		<0.001	
	Barium (and compounds)		<0.001	
	Benzene		0.07	
	Biphenyl		<0.01	
	Cadmium (and compounds)		<0.001	
	Cresol		0.07	
	Cumene		2.32	
	Diethanolamine		<0.01	
	Ethyl benzene		1.09	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles****Activity Number: PER20220001****Permit Number: 2520-00186-V1****Air - Title V Regular Permit Minor Mod**

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0043 617	Ethylene glycol		0.29	
	Formaldehyde		0.03	
	Glycol ethers (Table 51.1)		0.95	
	Glycol ethers (Table 51.3)		7.19	
	Hydrogen sulfide		0.16	
	Methanol		0.19	
	Methyl ethyl ketone		<0.01	
	Methyl isobutyl ketone		<0.01	
	n-Hexane		7.85	
	Naphthalene		1.04	
	Phenol		0.08	
	Polynuclear Aromatic Hydrocarbons		0.01	
	Quinoline		0.02	
	Styrene		0.33	
	Sulfuric acid		<0.01	
	Toluene		3.00	
	Xylene (mixed isomers)		6.02	
EQT 0044 619	1,4-Dioxane		0.01	
	1-Methylnaphthalene		0.09	
	2,2,4-Trimethylpentane		0.05	
	Acetaldehyde		1.89	
	Acrylic acid		<0.01	
	Antimony (and compounds)		<0.001	
	Barium (and compounds)		<0.001	
	Benzene		0.07	
	Biphenyl		<0.01	
	Cadmium (and compounds)		<0.001	
	Cresol		0.07	
	Cumene		2.32	
	Diethanolamine		<0.01	
	Ethyl benzene		1.09	
	Ethylene glycol		0.30	
	Formaldehyde		0.29	
	Glycol ethers (Table 51.1)		1.15	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles****Activity Number: PER20220001****Permit Number: 2520-00186-V1****Air - Title V Regular Permit Minor Mod**

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0044 619	Glycol ethers (Table 51.3)		4.98	
	Hydrogen sulfide		0.16	
	Methanol		0.70	
	Methyl ethyl ketone		<0.01	
	Methyl isobutyl ketone		<0.01	
	n-Hexane		7.85	
	Naphthalene		1.04	
	Phenol		0.08	
	Polynuclear Aromatic Hydrocarbons		0.01	
	Quinoline		0.02	
	Styrene		0.33	
	Sulfuric acid		<0.01	
	Toluene		3.00	
	Xylene (mixed isomers)		6.02	
EQT 0045 625	1,3-Butadiene		8.94	
	1,4-Dioxane		<0.01	
	1-Methylnaphthalene		0.19	
	2,2,4-Trimethylpentane		0.10	
	Acetaldehyde		1.31	
	Acrylic acid		<0.01	
	Antimony (and compounds)		<0.001	
	Barium (and compounds)		<0.001	
	Benzene		0.59	
	Biphenyl		0.01	
	Cadmium (and compounds)		<0.001	
	Cresol		0.14	
	Cumene		4.84	
	Diethanolamine		<0.01	
	Ethyl benzene		2.28	
	Ethylene glycol		0.62	
	Formaldehyde		0.06	
	Glycol ethers (Table 51.1)		0.05	
	Glycol ethers (Table 51.3)		11.32	
	Hydrogen sulfide		0.33	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles****Activity Number: PER20220001****Permit Number: 2520-00186-V1****Air - Title V Regular Permit Minor Mod**

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0045 625	Methanol		0.02	
	Methyl ethyl ketone		<0.01	
	Methyl isobutyl ketone		0.01	
	n-butyl alcohol		24.08	
	n-Hexane		16.36	
	Naphthalene		2.26	
	Phenol		0.16	
	Polynuclear Aromatic Hydrocarbons		0.03	
	Quinoline		0.04	
	Styrene		0.73	
	Sulfuric acid		<0.01	
	Toluene		6.29	
	Xylene (mixed isomers)		12.56	
	n-butyl alcohol	0.09		0.40
EQT 0047 632	2,2,4-Trimethylpentane	0.01		0.02
EQT 0048 633	Benzene	0.21		0.94
	Ethyl benzene	<0.01		<0.01
EQT 0049 634	n-Hexane	0.50		2.19
	Toluene	0.03		0.14
	Xylene (mixed isomers)	0.01		0.03
	1,3-Butadiene	0.072		0.315
	2,2,4-Trimethylpentane	<0.01		<0.01
	Acetaldehyde	<0.01		<0.01
	Benzene	0.24		1.05
	Ethyl benzene	<0.01		0.01
	n-Hexane	0.01		0.06
	Naphthalene	<0.01		<0.01
	Styrene	<0.01		0.01
	Toluene	0.04		0.16
	Xylene (mixed isomers)	<0.01		0.01
	1,3-Butadiene	0.193	1.388	0.845
EQT 0054 668	2,2,4-Trimethylpentane	<0.01	0.01	<0.01
	Acetaldehyde	<0.01	<0.01	<0.01
	Benzene	0.53	5.08	2.32

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles****Activity Number: PER20220001****Permit Number: 2520-00186-V1****Air - Title V Regular Permit Minor Mod**

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0054 668	Cumene	<0.01	<0.01	<0.01
	Ethyl benzene	<0.01	0.04	0.02
	n-Hexane	0.04	0.34	0.17
	Naphthalene	<0.01	<0.01	<0.01
	Styrene	0.01	0.08	0.03
	Toluene	0.10	0.98	0.45
	Xylene (mixed isomers)	0.01	0.06	0.03
EQT 0056 3407	Diethanolamine		0.02	
EQT 0059 3414	Ethyl Acrylate	0.14	6.84	0.61
	Methanol	<0.01	<0.01	<0.01
	Methyl methacrylate	0.04	1.88	0.20
EQT 0061 3416	1,4-Dioxane		0.02	
	1-Methylnaphthalene		0.09	
	2,2,4-Trimethylpentane		0.05	
	Acetaldehyde		4.32	
	Acrylic acid		<0.01	
	Antimony (and compounds)		<0.001	
	Barium (and compounds)		<0.001	
	Benzene		0.07	
	Biphenyl		<0.01	
	Cadmium (and compounds)		<0.001	
	Cresol		0.07	
	Cumene		2.32	
	Diethanolamine		<0.01	
	Ethyl benzene		1.09	
	Ethylene glycol		0.72	
	Formaldehyde		0.69	
	Glycol ethers (Table 51.1)		0.15	
	Glycol ethers (Table 51.3)		17.38	
	Hydrogen sulfide		0.16	
	Methanol		0.10	
	Methyl ethyl ketone		<0.01	
	Methyl isobutyl ketone		0.01	
	n-Hexane		7.85	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0061 3416	Naphthalene		1.04	
	Phenol		0.08	
	Polynuclear Aromatic Hydrocarbons		0.01	
	Quinoline		0.02	
	Styrene		0.33	
	Sulfuric acid		<0.01	
	Toluene		3.00	
	Xylene (mixed isomers)		6.83	
EQT 0076 3427	Ethyl Acrylate	0.14	6.84	0.61
	Methanol	<0.01	<0.01	<0.01
	Methyl methacrylate	0.04	1.88	0.20
FUG 0001	1,2-Dichloroethane	0.001		0.003
	1,3-Butadiene	0.084		0.369
	1,4-Dioxane	<0.01		<0.01
	1-Methylnaphthalene	0.02		0.08
	2,2,4-Trimethylpentane	<0.01		<0.01
	Acetaldehyde	<0.01		<0.01
	Acrylic acid	0.05		0.21
	Benzene	<0.01		0.02
	Biphenyl	0.01		0.04
	Cresol	<0.01		0.01
	Cumene	0.02		0.07
	Diethanolamine	0.33		1.45
	Ethyl benzene	<0.01		<0.01
	Ethylene glycol	0.32		1.38
	Formaldehyde	<0.01		<0.01
	Glycol ethers (Table 51.1)	<0.01		<0.01
	Glycol ethers (Table 51.3)	0.32		1.38
	Hydrogen sulfide	<0.01		<0.01
	Hydroquinone	<0.01		<0.01
	Methanol	0.07		0.31
	Methyl ethyl ketone	<0.01		<0.01
	Methyl isobutyl ketone	<0.01		<0.01
	n-butyl alcohol	0.11		0.48

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles****Activity Number: PER20220001****Permit Number: 2520-00186-V1****Air - Title V Regular Permit Minor Mod**

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
FUG 0001	n-Hexane	0.01		0.05
	Naphthalene	0.06		0.26
	Phenol	<0.01		<0.01
	Polynuclear Aromatic Hydrocarbons	0.008		0.035
	Quinoline	<0.01		0.02
	Styrene	<0.01		<0.01
	Toluene	0.01		0.03
	Xylene (mixed isomers)	0.03		0.12
GRP 0001 3400	1,3-Butadiene	0.27		1.16
	Acetaldehyde	0.02		0.07
	Benzene	0.01		0.05
	Biphenyl	<0.01		<0.01
	Diethanolamine	<0.01		<0.01
	Ethyl benzene	<0.01		<0.01
	Formaldehyde	0.01		0.04
	Glycol ethers (Table 51.1)	<0.01		<0.01
	Glycol ethers (Table 51.3)	0.03		0.12
	Hydrogen sulfide	0.02		0.09
	Methanol	<0.01		<0.01
	n-butyl alcohol	1.27		5.56
	Naphthalene	<0.01		0.01
	Styrene	<0.01		<0.01
	Toluene	<0.01		<0.01
	Xylene (mixed isomers)	<0.01		<0.01
	1,3-Butadiene	1.58		7.36
	Benzene	0.07		0.30
GRP 0002 3428	Biphenyl	<0.01		<0.01
	Ethyl benzene	<0.01		0.01
	Naphthalene	0.01		0.04
	Polynuclear Aromatic Hydrocarbons	0.001		0.002
	Styrene	0.01		0.03
	Toluene	<0.01		0.02
	Xylene (mixed isomers)	<0.01		0.02
	1,4-Dioxane	<0.01		<0.01
GRP 0003 3429				

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles****Activity Number: PER20220001****Permit Number: 2520-00186-V1****Air - Title V Regular Permit Minor Mod**

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
GRP 0003 3429	1-Methylnaphthalene	0.04		0.19
	2,2,4-Trimethylpentane	0.01		0.04
	Acetaldehyde	0.15		0.66
	Acrylic acid	<0.01		<0.01
	Antimony (and compounds)	<0.001		<0.001
	Barium (and compounds)	<0.001		<0.001
	Benzene	0.03		0.15
	Biphenyl	<0.01		<0.01
	Cadmium (and compounds)	<0.001		<0.001
	Cresol	0.03		0.14
	Cumene	0.99		4.33
	Diethanolamine	<0.01		<0.01
	Ethyl benzene	0.51		2.26
	Ethylene glycol	0.04		0.15
	Formaldehyde	0.01		0.03
	Glycol ethers (Table 51.1)	<0.01		<0.01
	Glycol ethers (Table 51.3)	0.61		2.66
	Hydrogen sulfide	0.05		0.24
	Methanol	<0.01		<0.01
	Methyl ethyl ketone	<0.01		<0.01
	Methyl isobutyl ketone	<0.01		0.01
	n-Hexane	3.62		15.87
	Naphthalene	0.50		2.20
	Phenol	0.04		0.17
	Polynuclear Aromatic Hydrocarbons	0.01		0.03
	Quinoline	0.01		0.04
	Styrene	0.16		0.70
	Sulfuric acid	<0.01		<0.01
	Toluene	1.42		6.23
	Xylene (mixed isomers)	2.56		11.21
GRP 0004 3430	1,4-Dioxane	<0.01		<0.01
	1-Methylnaphthalene	0.01		0.06
	2,2,4-Trimethylpentane	<0.01		0.02
	Acetaldehyde	0.14		0.63

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles****Activity Number: PER20220001****Permit Number: 2520-00186-V1****Air - Title V Regular Permit Minor Mod**

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
GRP 0004 3430	Acrylic acid	<0.01		<0.01
	Antimony (and compounds)	<0.001		<0.001
	Barium (and compounds)	<0.001		<0.001
	Benzene	0.01		0.05
	Biphenyl	<0.01		<0.01
	Cadmium (and compounds)	<0.001		<0.001
	Cresol	0.01		0.04
	Cumene	0.34		1.47
	Diethanolamine	<0.01		<0.01
	Ethyl benzene	0.17		0.73
	Ethylene glycol	0.04		0.18
	Formaldehyde	0.01		0.03
	Glycol ethers (Table 51.1)	<0.01		<0.01
	Glycol ethers (Table 51.3)	0.69		3.03
	Hydrogen sulfide	0.02		0.08
	Methanol	<0.01		<0.01
	Methyl ethyl ketone	<0.01		<0.01
	Methyl isobutyl ketone	<0.01		<0.01
	n-Hexane	1.21		5.29
	Naphthalene	0.16		0.70
	Phenol	0.01		0.05
	Polynuclear Aromatic Hydrocarbons	<0.01		0.01
	Quinoline	<0.01		0.01
	Styrene	0.05		0.22
	Sulfuric acid	<0.01		<0.01
	Toluene	0.46		2.02
	Xylene (mixed isomers)	0.87		3.81
UNF 0002	1,2-Dichloroethane			0.003
	1,3-Butadiene			10.985
	1,4-Dioxane			0.01
	1-Methylnaphthalene			0.33
	2,2,4-Trimethylpentane			0.15
	Acetaldehyde			1.47
	Acrylic acid			0.21

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002	Antimony (and compounds)			<0.01
	Barium (and compounds)			<0.01
	Benzene			10.39
	Biphenyl			0.04
	Cadmium (and compounds)			<0.01
	Cresol			0.19
	Cumene			5.87
	Diethanolamine			1.46
	Ethyl Acrylate			0.61
	Ethyl benzene			3.05
	Ethylene glycol			1.95
	Formaldehyde			0.11
	Glycol ethers (Table 51.1)			0.01
	Glycol ethers (Table 51.3)			7.39
	Hydrogen sulfide			0.41
	Hydroquinone			<0.01
	Methanol			1.12
	Methyl Cellosolve Acetate			<0.01
	Methyl ethyl ketone			0.01
	Methyl isobutyl ketone			0.02
	Methyl methacrylate			0.20
	n-butyl alcohol			7.23
	n-Hexane			29.42
	Naphthalene			3.21
	Phenol			0.23
	Polynuclear Aromatic Hydrocarbons			0.077
	Quinoline			0.07
	Styrene			1.03
	Sulfuric acid			<0.01
	Toluene			9.87
	Xylene (mixed isomers)			15.33

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

CRG 0001 - HON Group 2 Tanks

Group Members: EQT 0003 EQT 0006 EQT 0007 EQT 0008 EQT 0009 EQT 0019 EQT 0020 EQT 0021 EQT 0028 EQT 0029 EQT 0030 EQT 0031

- 1 [40 CFR 63.123(a)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]

CRG 0003 - EFR Tanks

Group Members: EQT 0014 EQT 0016 EQT 0037 EQT 0038 EQT 0041 EQT 0042 EQT 0048 EQT 0049

- 2 [40 CFR 61.351(a)(2)] Install and operate an external floating roof meeting the requirements of 40 CFR 60.112b(a)(2). Subpart FF. As per 40 CFR 63.1100(g)(6)(ii), compliance with 40 CFR 63 Subpart YY constitutes compliance with 40 CFR 61 Subpart FF. [40 CFR 61.351(a)(2)]
- 3 [40 CFR 63.1062] Comply with one of the requirements listed in paragraphs (a)(1) through (a)(3) of this section. Subpart WW.
- 4 [40 CFR 63.1063] Comply with all the external floating roof requirements in paragraphs (a) through (e) of this section. Subpart WW.
- 5 [40 CFR 63.1065(a)] A record shall be kept of the of dimensions of the storage vessel, an analysis of the capacity of the storage vessel, and an identification of the liquid stored for as long as liquid is stored in the vessel. [40 CFR 63.1065(a)]
- 6 [40 CFR 63.1065(b)] Records of floating roof inspection results shall be kept as specified in paragraphs (b)(1) and (b)(2) of this section. Subpart WW. [40 CFR 63.1065(b)]
- 7 [40 CFR 63.1065(c)] The owner or operator shall keep a record of the date when a floating roof is set on its legs or other support devices. The owner or operator shall also keep a record of the date when the roof was refloated, and the record shall indicate whether the process of refloating was continuous. Subpart WW. [40 CFR 63.1065(c)]
- 8 [40 CFR 63.1066] Comply with all applicable reporting requirements of 40 CFR 1066(a) & (b). Subpart WW.
- 9 [40 CFR 63.1100(g)(6)(ii)] After the compliance date specified in § 63.1102, compliance with § 63.1103(e) shall constitute compliance with the Benzene Waste Operations NESHA (Subpart FF of 40 CFR Part 61) for waste streams that are subject to both the control requirements of § 63.1103(e)(3) for ethylene production sources and the control requirements of 40 CFR part 61, subpart FF. Subpart YY. [40 CFR 63.1100(g)(6)(ii)]
- 10 [40 CFR 63.1103(e)(3)] Comply with all applicable provisions of 40 CFR 63 Subpart WW per Table 7(b)(1)(i) to 40 CFR 63.1103(e)(3). Subpart YY. [40 CFR 63.1103(e)(3)]
- 11 [LAC 33:III.2103.B] Equip with a submerged fill pipe.
- 12 [LAC 33:III.2103.D.2.a] Seal closure devices required in LAC 33:III.2103.D shall have no visible holes, tears, or other openings in the seals or seal fabric.
- 13 [LAC 33:III.2103.D.2.b] Seal closure devices required in LAC 33:III.2103.D shall be intact and uniformly in place around the circumference of the floating roof and the tank wall.
- 14 [LAC 33:III.2103.D.2.c] Seal gap area $\leq 1 \text{ in}^2/\text{ft}$ of tank diameter (6.5 cm²/0.3 m), for gaps between the secondary seal and tank wall that exceed 1/8 inch (0.32 cm) in width.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

CRG 0003 - EFR Tanks

- | | |
|----------------------------|--|
| 15 [LAC 33:III.2103.D.2.d] | Seal gap area $\leq 10 \text{ in}^2/\text{ft}$ of tank diameter (65 cm ² /0.3 m), for gaps between the primary seal and tank wall that exceed 1/8 inch (0.32 cm) in width. |
| 16 [LAC 33:III.2103.D.2.e] | Which Months: All Year Statistical Basis: None specified
Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. Keep records of conditions that are not up to the standards described in LAC 33:III.2103.D.2, and the date(s) that the standards are not met. Notify the administrative authority within seven days of noncompliance with LAC 33:III.2103.D.2. |
| 17 [LAC 33:III.2103.D.2.e] | Initiate repairs of seals within seven working days of recognition of defective conditions by ordering appropriate parts, to avoid noncompliance with LAC 33:III.2103. Complete repairs within three months of the ordering of the repair parts. |
| 18 [LAC 33:III.2103.D.2.e] | Primary seals: Seal gap area & width monitored by measurement once every five years at any tank level, provided the roof is off its legs. |
| 19 [LAC 33:III.2103.D.2.e] | Which Months: All Year Statistical Basis: None specified
Secondary Seal or closure mechanism monitored by visual inspection/determination semiannually. |
| 20 [LAC 33:III.2103.D.2.e] | Which Months: All Year Statistical Basis: None specified
Secondary seals: Seal gap area & width monitored by measurement annually at any tank level, provided the roof is off its legs. |
| 21 [LAC 33:III.2103.D.3] | Which Months: All Year Statistical Basis: None specified
Provide all openings in the external floating roof (except for automatic bleeder vents, rim space vent, and leg sleeves) with a projection below the liquid surface. Equip each opening in the roof (except for automatic bleeder vents, rim space vents, roof drains, and leg sleeves) with a cover, seal or lid that is to be maintained in a closed position at all times except when the device is in actual use. Keep automatic bleeder vents closed at all times except when the roof is being floated off the roof leg supports. Set rim vents to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting. Equip any emergency roof drain with a slotted membrane fabric cover or equivalent cover that covers at least 90 percent of the opening. |
| 22 [LAC 33:III.2103.D] | Equip with an external floating roof consisting of a pontoon type roof, double deck type roof, or external floating cover which will rest or float on the surface of the liquid contents and is equipped with a primary closure seal to close the space between the roof edge and tank wall and a continuous secondary seal (a rim mounted secondary) extending from the floating roof to the tank wall. |
| 23 [LAC 33:III.2103.H.1] | Determine compliance with LAC 33:III.2103.D.2 and 4 using the methods in LAC 33:III.2103.H.1. |
| 24 [LAC 33:III.2103.H.3] | Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e. |
| 25 [LAC 33:III.2103.I] | Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable. |

CRG 0004 - LAC_2103_B Tanks

Group Members: EQT 0068 EQT 0023 EQT 0062 EQT 0063 EQT 0064 EQT 0065 EQT 0072

- | | |
|--------------------------|--|
| 26 [LAC 33:III.2103.B] | Equip with a submerged fill pipe. |
| 27 [LAC 33:III.2103.E.1] | VOC, Total $\geq 95\%$ control efficiency using a vapor loss control system. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: None specified |

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

CRG 0004 - LAC_2103_B Tanks

- | | |
|--------------------------|---|
| 28 [LAC 33:III.2103.E] | Equip with a vapor loss control system that consists of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. Ensure that all tank gauging and sampling devices are gas-tight except when gauging or sampling is taking place. |
| 29 [LAC 33:III.2103.H.3] | Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e. |
| 30 [LAC 33:III.2103.I] | Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 through I.7, as applicable. Maintain records for at least two years. |

CRG 0005 - Fixed Roof Tanks

Group Members: EQT 0018 EQT 0024 EQT 0026

- | | |
|--------------------------|---|
| 31 [LAC 33:III.5109.A.1] | Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. MACT is determined to be installation of a fixed roof to limit evaporative emissions from the tank. |
|--------------------------|---|

EQT 0001 607 - Tank 3101

- | | |
|-------------------------------|--|
| 32 [40 CFR 60.110b] | Per 40 CFR 63.1100(g)(1)(ii), comply with the storage vessel requirements of 40 CFR 63 Subpart YY. Subpart Kb. |
| 33 [40 CFR 61.351(a)(2)] | Install and operate an external floating roof meeting the requirements of 40 CFR 60.112b(a)(2). Subpart FF.
As per 40 CFR 63.1100(g)(6)(ii), compliance with 40 CFR 63 Subpart YY constitutes compliance with 40 CFR 61 Subpart FF. [40 CFR 61.351(a)(2)] |
| 34 [40 CFR 63.1062] | Comply with one of the requirements listed in paragraphs (a)(1) through (a)(3) of this section. Subpart WW. |
| 35 [40 CFR 63.1063] | Comply with all the external floating roof requirements in paragraphs (a) through (e) of this section. Subpart WW. |
| 36 [40 CFR 63.1065(a)] | A record shall be kept of the of dimensions of the storage vessel, an analysis of the capacity of the storage vessel, and an identification of the liquid stored for as long as liquid is stored in the vessel. [40 CFR 63.1065(a)] |
| 37 [40 CFR 63.1065(b)] | Records of floating roof inspection results shall be kept as specified in paragraphs (b)(1) and (b)(2) of this section. Subpart WW. [40 CFR 63.1065(b)] |
| 38 [40 CFR 63.1065(c)] | The owner or operator shall keep a record of the date when a floating roof is set on its legs or other support devices. The owner or operator shall also keep a record of the date when the roof was refloated, and the record shall indicate whether the process of refloating was continuous. Subpart WW. [40 CFR 63.1065(c)] |
| 39 [40 CFR 63.1066] | Comply with all applicable reporting requirements of 40 CFR 1066(a) & (b). Subpart WW. |
| 40 [40 CFR 63.1100(g)(6)(ii)] | After the compliance date specified in § 63.1102, compliance with § 63.1103(e) shall constitute compliance with the Benzene Waste Operations NESHAP (Subpart FF of 40 CFR Part 61) for waste streams that are subject to both the control requirements of § 63.1103(e)(3) for ethylene production sources and the control requirements of 40 CFR part 61, subpart FF. Subpart YY. [40 CFR 63.1100(g)(6)(ii)] |
| 41 [40 CFR 63.1103(e)(3)] | Comply with all applicable provisions of 40 CFR 63 Subpart WW per Table 7(b)(1)(i) to 40 CFR 63.1103(e)(3). Subpart YY. [40 CFR 63.1103(e)(3)] |
| 42 [LAC 33:III.2103.B] | Equip with a submerged fill pipe. |
| 43 [LAC 33:III.2103.D.2.a] | Seal closure devices required in LAC 33:III.2103.D shall have no visible holes, tears, or other openings in the seals or seal fabric. |

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

EQT 0001 607 - Tank 3101

- 44 [LAC 33:III.2103.D.2.b] Seal closure devices required in LAC 33:III.2103.D shall be intact and uniformly in place around the circumference of the floating roof and the tank wall.
- 45 [LAC 33:III.2103.D.2.c] Seal gap area $\leq 1 \text{ in}^2/\text{ft}$ of tank diameter (6.5 cm²/0.3 m), for gaps between the secondary seal and tank wall that exceed 1/8 inch (0.32 cm) in width.
Which Months: All Year Statistical Basis: None specified
- 46 [LAC 33:III.2103.D.2.d] Seal gap area $\leq 10 \text{ in}^2/\text{ft}$ of tank diameter (65 cm²/0.3 m), for gaps between the primary seal and tank wall that exceed 1/8 inch (0.32 cm) in width.
Which Months: All Year Statistical Basis: None specified
- 47 [LAC 33:III.2103.D.2.e] Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. Keep records of conditions that are not up to the standards described in LAC 33:III.2103.D.2, and the date(s) that the standards are not met. Notify the administrative authority within seven days of noncompliance with LAC 33:III.2103.D.2.
- 48 [LAC 33:III.2103.D.2.e] Initiate repairs of seals within seven working days of recognition of defective conditions by ordering appropriate parts, to avoid noncompliance with LAC 33:III.2103. Complete repairs within three months of the ordering of the repair parts.
- 49 [LAC 33:III.2103.D.2.e] Primary seals: Seal gap area & width monitored by measurement once every five years at any tank level, provided the roof is off its legs.
Which Months: All Year Statistical Basis: None specified
- 50 [LAC 33:III.2103.D.2.e] Secondary Seal or closure mechanism monitored by visual inspection/determination semiannually.
Which Months: All Year Statistical Basis: None specified
- 51 [LAC 33:III.2103.D.2.e] Secondary seals: Seal gap area & width monitored by measurement annually at any tank level, provided the roof is off its legs.
Which Months: All Year Statistical Basis: None specified
- 52 [LAC 33:III.2103.D.3] Provide all openings in the external floating roof (except for automatic bleeder vents, rim space vent, and leg sleeves) with a projection below the liquid surface. Equip each opening in the roof (except for automatic bleeder vents, rim space vents, roof drains, and leg sleeves) with a cover, seal or lid that is to be maintained in a closed position at all times except when the device is in actual use. Keep automatic bleeder vents closed at all times except when the roof is being floated off the roof leg supports. Set rim vents to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting. Equip any emergency roof drain with a slotted membrane fabric cover or equivalent cover that covers at least 90 percent of the opening.
- 53 [LAC 33:III.2103.D] Equip with an external floating roof consisting of a pontoon type roof, double deck type roof, or external floating cover which will rest or float on the surface of the liquid contents and is equipped with a primary closure seal to close the space between the roof edge and tank wall and a continuous secondary seal (a rim mounted secondary) extending from the floating roof to the tank wall.
- 54 [LAC 33:III.2103.H.1] Determine compliance with LAC 33:III.2103.D.2 and 4 using the methods in LAC 33:III.2103.H.1.
- 55 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 56 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0025 536 - Tank 2220 (Internal Floating Roof)

- 57 [40 CFR 63.119(a)(1)] For this Group 1 storage vessel, reduce hazardous air pollutants emissions to the atmosphere by using an internal floating roof in accordance with 63.119(b). [40 CFR 63.119(a)(1)]

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

EQT 0025 536 - Tank 2220 (Internal Floating Roof)

- 58 [40 CFR 63.119(b)(1)] The internal floating roof shall be floating on the liquid surface at all times except when the floating roof must be supported by the leg supports during the periods specified in paragraphs (b)(1)(i) through (b)(1)(iii) of this section.
- (i) During the initial fill.
- (ii) After the vessel has been completely emptied and degassed.
- (iii) When the vessel is completely emptied before being subsequently refilled. [40 CFR 63.119(b)(1)]
- 59 [40 CFR 63.119(b)(2)] When the floating roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as soon as practical. [40 CFR 63.119(b)(2)]
- 60 [40 CFR 63.119(b)(3)] Each internal floating roof shall be equipped with a closure device between the wall of the storage vessel and the roof edge. Except as provided in paragraph (b)(3)(iv) of this section, the closure device shall consist of one of the devices listed in paragraph (b)(3)(i), (b)(3)(ii), or (b)(3)(iii) of this section. [40 CFR 63.119(b)(3)]
- 61 [40 CFR 63.119(b)(4)] 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. [40 CFR 63.119(b)(4)]
- 62 [40 CFR 63.119(b)(5)] Except as provided in paragraph (b)(5)(viii) of this section, each internal floating roof shall meet the specifications listed in paragraphs (b)(5)(i) through (b)(5)(vii) of this section. [40 CFR 63.119(b)(5)]
- 63 [40 CFR 63.119(b)(6)] Each cover or lid on any opening in the internal floating roof shall be closed (i.e., no visible gaps), except when the cover or lid must be open for access. Covers on each access hatch and each gauge float well shall be bolted or fastened so as to be air-tight when they are closed. Rim space vents are to be set to open only when the internal floating roof is not floating or when the pressure beneath the rim seal exceeds the manufacturer's recommended setting. [40 CFR 63.119(b)(6)]
- 64 [40 CFR 63.120(a)(1)] The owner or operator shall visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), according to the schedule specified in paragraphs (a)(2) and (a)(3) of this section. [40 CFR 63.120(a)(1)]
- 65 [40 CFR 63.120(a)(4)] If during the inspections required by paragraph (a)(2)(i) or (a)(3)(ii), the internal floating roof is not resting on the surface of the liquid inside the storage vessel and is not resting on the leg supports; or there is liquid on the floating roof; or the seal is detached; or there are holes or tears in the seal fabric; or there are visible gaps between the seal and the wall of the storage vessel, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 calendar days. If a failure that is detected during inspections required by paragraph (a)(2)(i) or (a)(3)(ii) of this section cannot be repaired within 45 calendar days and if the vessel cannot be emptied within 45 calendar days, the owner or operator may utilize up to 2 extensions of up to 30 additional calendar days each. Documentation of a decision to utilize an extension shall include a description of the failure, shall document that alternate storage capacity is unavailable, and shall specify a schedule of actions that will ensure that the control equipment will be repaired or the vessel will be emptied as soon as practical. [40 CFR 63.120(a)(4)]
- 66 [40 CFR 63.120(a)(6)] If the inspection required by paragraph (a)(2)(ii), (a)(3)(i), or (a)(3)(iii) is not planned and the owner or operator could not have known about the inspection 30 calendar days in advance of refilling the vessel, the owner or operator shall notify the Administrator at least 7 calendar days prior to the refilling of the storage vessel. Notification may be made by telephone and immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, the notification including the written documentation may be made in writing and sent so that it is received by the Administrator at least 7 calendar days prior to refilling. [40 CFR 63.120(a)(6)]

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

EQT 0025 536 - Tank 2220 (Internal Floating Roof)

- 67 [40 CFR 63.120(a)(7)] If during the inspections required by paragraph (a)(2)(ii), (a)(3)(i), or (a)(3)(iii), the internal floating roof has defects; or 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 surface 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 organic HAP. [40 CFR 63.120(a)(7)]
- 68 [40 CFR 63.122(a)(1)] Submit an Initial Notification as required by 40 CFR 63.151(b). Subpart G. [40 CFR 63.122(a)(1)]
- 69 [40 CFR 63.122(a)(3)] Submit a Notification of Compliance Status as required by 40 CFR 63.152(b). Include the information specified in 40 CFR 63.122(c). Subpart G. [40 CFR 63.122(a)(3)]
- 70 [40 CFR 63.122(a)(4)] Submit Periodic Reports as required by 40 CFR 63.152(c). Include the information specified in 40 CFR 63.122(d), (e), (f), and (g). Subpart G. [40 CFR 63.122(a)(4)]
- 71 [40 CFR 63.122(a)(5)] Submit, as applicable, other reports as required by 40 CFR 63.152(d). Include the information specified in 40 CFR 63.122(h). Subpart G. [40 CFR 63.122(a)(5)]
- 72 [40 CFR 63.122(d)] An owner or operator who elects to comply with 40 CFR 63.119(b) of this subpart by using a fixed roof and an internal floating roof or with 40 CFR 63.119(d) of this subpart by using an external floating roof converted to an internal floating roof shall submit, as part of the Periodic Report required under 40 CFR 63.152(c) of this subpart, the results of each inspection conducted in accordance with 40 CFR 63.120(a) of this subpart in which a failure is detected in the control equipment. [40 CFR 63.122(d)]
- 73 [40 CFR 63.123] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep readily accessible records of the information specified in 40 CFR 63.123(a) through (i), as applicable. Keep the records as long as the storage vessel retains Group 1 status and is in operation. Subpart G.
- 74 [LAC 33:III.2103.B] Equip with a submerged fill pipe.
- 75 [LAC 33:III.2103.C] Equip with an internal floating roof consisting of a pontoon type roof, double deck roof, or internal floating cover which rests or floats on the surface of the liquid contents and is equipped with a closure seal to close the space between the roof edge and tank wall. Ensure that all tank gauging and sampling devices are gas-tight except when gauging or sampling is taking place.
- 76 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 77 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 through I.7, as applicable. Maintain records for at least two years.

EQT 0027 538 - Tank 2230

- 78 [40 CFR 63.2346(a)(1)] Meet the emission limits specified in item 1.a.i (as referenced in item 2.a.i) of Table 2 to this subpart and comply with 40 CFR 63.2346(l) and the applicable requirements specified in 40 CFR 63 Subpart SS, for meeting emission limits. Subpart EEEE. [40 CFR 63.2346(a)(1)]
- 79 [40 CFR 63.2346(a)(1)] TOC or Organic HAP >= 95 % reduction by weight, or <= 20 ppmv (dry basis @ 3% O2), by venting emissions through a closed vent system to any combination of control devices meeting the applicable requirements of 40 CFR 63 Subpart SS and 40 CFR 63.2346(l). Subpart EEEE. Emissions are routed to a thermal treatment unit control device with a 98% control efficiency. [40 CFR 63.2346(a)(1)]
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

EQT 0027 538 - Tank 2230

- 80 [40 CFR 63.2346(a)(6)] Beginning no later than the compliance dates specified in §63.2342(e), tank emissions during storage tank shutdown operations (i.e., emptying and degassing of a storage tank) for each storage tank at an affected source storing organic liquids that meets the tank capacity and liquid vapor pressure criteria for control in items 3 through 6 of Table 2 to this subpart, or items 1 through 3 of Table 2b to this subpart, you must comply with paragraphs (a)(6)(i) through (iii) of this section during tank emptying and degassing until the vapor space concentration in the tank is less than 10 percent of the lower explosive limit (LEL). The owner or operator must determine the LEL using process instrumentation or portable measurement devices and follow procedures for calibration and maintenance according to manufacturer's specifications. [40 CFR 63.2346(a)(6)]
- 81 [40 CFR 63.2390] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.2390(b) through (h), as applicable. Subpart EEEE.
- 82 [40 CFR 63.2394] Keep records in a form suitable and readily available for expeditious inspection and review according to 40 CFR 63.10(b), including records stored in electronic form at a separate location. Keep files of all information (including all reports and notifications) for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b). The remaining 3 years may be kept off site. Subpart EEEE.

EQT 0032 571 - Tank 2141 (Non-Venting Sphere)

- 83 [LAC 33:III.2103.B] Capable of maintaining working pressures sufficient at all times under normal operating conditions to prevent vapor or gas loss to the atmosphere.
- 84 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 85 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 through I.7, as applicable. Maintain records for at least two years.

EQT 0036 599 - Tank 1300 (Internal Floating Roof)

- 86 [LAC 33:III.2103.B] Equip with a submerged fill pipe.
- 87 [LAC 33:III.2103.C] Equip with an internal floating roof consisting of a pontoon type roof, double deck roof, or internal floating cover which will rest or float on the surface of the liquid contents and is equipped with a closure seal to close the space between the roof edge and tank wall. All tank gauging and sampling devices will be gas-tight except when gauging or sampling is taking place.
- 88 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 89 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 90 [LAC 33:III.5109.A.1] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. MACT is determined to be installation of an internal floating roof.

EQT 0039 602 - Tank 2102 (Internal Floating Roof)

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

EQT 0039 602 - Tank 2102 (Internal Floating Roof)

- 91 [40 CFR 63.119(a)(1)] Reduce hazardous air pollutants emissions to the atmosphere by operating and maintaining a fixed roof and internal floating roof in accordance with the requirements in 40 CFR 63.119(b)(1)-(b)(6). Subpart G. [40 CFR 63.119(a)(1)]
- 92 [40 CFR 63.119(b)(3)] Internal floating roof: Equip each internal floating roof with a closure device between the wall of the storage vessel and the roof edge. Closure device shall consist of one of the devices listed in 40 CFR 63.119(b)(3)(i) through (b)(3)(iii), except as specified in 40 CFR 63.119(b)(3)(iv). Subpart G. [40 CFR 63.119(b)(3)]
- 93 [40 CFR 63.119(b)(4)] Internal floating roof: Ensure that automatic bleeder vents are 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. Subpart G. [40 CFR 63.119(b)(4)]
- 94 [40 CFR 63.119(b)(5)] Internal floating roof: Ensure that each internal floating roof meets the specifications listed in 40 CFR 63.119(b)(5)(i) through (b)(5)(vii), except as provided in 40 CFR 63.119(b)(5)(viii). Subpart G. [40 CFR 63.119(b)(5)]
- 95 [40 CFR 63.119(b)(6)] Internal floating roof: Ensure that each cover or lid on any opening in the internal floating roof is closed except when the cover or lid must be open for access. Ensure that covers on each access hatch and each gauge float well are bolted or fastened so as to be air-tight when they are closed. Rim space vents are to be set to open only when the internal floating roof is not floating or when the pressure beneath the rim seal exceeds the manufacturer's recommended setting. Subpart G. [40 CFR 63.119(b)(6)]
- 96 [40 CFR 63.119(b)] Internal floating roof: Ensure that the internal floating roof is floating on the surface at all times except when the floating roof must be supported by the leg supports during the periods specified in 40 CFR 63.119(b)(1)(i) through (b)(1)(iii). When the floating roof is resting on the leg supports, ensure that the process of filling, emptying or refilling is continuous and accomplished as soon as practical. Subpart G. [40 CFR 63.119(b)]
- 97 [40 CFR 63.120(a)(1)] Tank roof and seals monitored by visual inspection/determination at the regulation's specified frequency. Inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service) according to the schedule specified in 40 CFR 63.120(a)(2) and (a)(3). Subpart G. [40 CFR 63.120(a)(1)]
Which Months: All Year Statistical Basis: None specified
- 98 [40 CFR 63.120(a)(4)] Repair storage vessel or empty and remove from service within 45 calendar days, if during the inspections required by 40 CFR 63.120(a)(2)(i) or (a)(3)(ii), any of the conditions specified in 40 CFR 63.120(a)(4) are found. Subpart G. [40 CFR 63.120(a)(4)]
- 99 [40 CFR 63.120(a)(7)] If any of the conditions listed in 40 CFR 63.120(a)(7) are found during the inspections required by 40 CFR 63.120(a)(2)(ii), (a)(3)(i), or (a)(3)(iii), repair the storage vessel as necessary so that none of the conditions specified exist before filling or refilling the storage vessel with organic HAP. Subpart G. [40 CFR 63.120(a)(7)]
- 100 [40 CFR 63.120(a)] Submit Notification: Due in writing at least 30 calendar days prior to the refilling of each storage vessel to afford DEQ the opportunity to have an observer present, for all the inspections required by 40 CFR 63.120(a)(2)(ii), (a)(3)(i), and (a)(3)(ii). If the inspection required by 40 CFR 63.120(a)(2)(ii), (a)(3)(i), or (a)(3)(ii) is not planned and it could not have been known about 30 calendar days in advance of refilling, submit notification at least 7 calendar days prior to the refilling. Notification can be made by telephone and immediately followed by written documentation demonstrating why the inspection was unplanned. Subpart G. [40 CFR 63.120(a)]
- 101 [40 CFR 63.122(a)(1)] Submit an Initial Notification as required by 40 CFR 63.151(b). Subpart G. [40 CFR 63.122(a)(1)]
- 102 [40 CFR 63.122(a)(3)] Submit a Notification of Compliance Status as required by 40 CFR 63.152(b). Include the information specified in 40 CFR 63.122(c). Subpart G. [40 CFR 63.122(a)(3)]
- 103 [40 CFR 63.122(a)(4)] Submit Periodic Reports as required by 40 CFR 63.152(d). Include the information specified in 40 CFR 63.122(d), (e), (f), and (g). Subpart G. [40 CFR 63.122(a)(4)]

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

EQT 0039 602 - Tank 2102 (Internal Floating Roof)

- | | | |
|-----|-----------------------|--|
| 104 | [40 CFR 63.122(a)(5)] | Submit, as applicable, other reports as required by 40 CFR 63.152(d). Include the information specified in 40 CFR 63.122(h). Subpart G. [40 CFR 63.122(a)(5)] |
| 105 | [40 CFR 63.122(d)] | An owner or operator who elects to comply with §63.119(b) of this subpart by using a fixed roof and an internal floating roof or with §63.119(d) of this subpart by using an external floating roof converted to an internal floating roof shall submit, as part of the Periodic Report required under §63.152(c) of this subpart, the results of each inspection conducted in accordance with §63.120(a) of this subpart in which a failure is detected in the control equipment. Subpart G. [40 CFR 63.122(d)] |
| 106 | [40 CFR 63.123] | Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records of the information specified in 40 CFR 63.123(a) through (h), as applicable. Keep the records as long as the storage vessel retains Group 1 status and is in operation. Subpart G. |
| 107 | [LAC 33:III.2103.B] | Equip with a submerged fill pipe. |
| 108 | [LAC 33:III.2103.C] | Equip with an internal floating roof consisting of a pontoon type roof, double deck roof, or internal floating cover which will rest or float on the surface of the liquid contents and is equipped with a closure seal to close the space between the roof edge and tank wall. All tank gauging and sampling devices will be gas-tight except when gauging or sampling is taking place. |
| 109 | [LAC 33:III.2103.H.3] | Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e. |
| 110 | [LAC 33:III.2103.I] | Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable. |

EQT 0040 603 - Tank 2205 (Internal Floating Roof)

- | | | |
|-----|-----------------------|--|
| 111 | [LAC 33:III.2103.B] | Equip with a submerged fill pipe. |
| 112 | [LAC 33:III.2103.C] | Equip with an internal floating roof consisting of a pontoon type roof, double deck roof, or internal floating cover which will rest or float on the surface of the liquid contents and is equipped with a closure seal to close the space between the roof edge and tank wall. All tank gauging and sampling devices will be gas-tight except when gauging or sampling is taking place. |
| 113 | [LAC 33:III.2103.H.3] | Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e. |
| 114 | [LAC 33:III.2103.I] | Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable. |

EQT 0045 625 - No. 2 Dock

- | | | |
|-----|-----------------------|--|
| 115 | [40 CFR 63.560(a)(3)] | Comply with the recordkeeping requirements of 40 CFR 63.567(j)(4) and the emission estimation requirements of 40 CFR 63.565(l). Subpart Y. [40 CFR 63.560(a)(3)] |
| 116 | [40 CFR 63.560(a)(4)] | Meet the submerged fill standards of 46 CFR 153.282. Subpart Y. [40 CFR 63.560(a)(4)] |

EQT 0046 625A - No. 1 Dock

- | | | |
|-----|-----------------------|--|
| 117 | [40 CFR 63.560(a)(3)] | Comply with the recordkeeping requirements of 40 CFR 63.567(j)(4) and the emission estimation requirements of 40 CFR 63.565(l). Subpart Y. [40 CFR 63.560(a)(3)] |
|-----|-----------------------|--|

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

EQT 0046 625A - No. 1 Dock

118 [40 CFR 63.560(a)(4)] Meet the submerged fill standards of 46 CFR 153.282. Subpart Y. [40 CFR 63.560(a)(4)]

EQT 0054 668 - No. 1 Dock Thermal Treatment Unit

119 [40 CFR 63.560(a)(3)] Comply with the recordkeeping requirements of 40 CFR 63.567(j)(4) and the emission estimation requirements of 40 CFR 63.565(l). Subpart Y. [40 CFR 63.560(a)(3)]

120 [40 CFR 63.560(a)(4)] Meet the submerged fill standards of 46 CFR 153.282. Subpart Y. [40 CFR 63.560(a)(4)]

121 [LAC 33:III.1105] Opacity <= 20 percent, except for a combined total of six hours in any 10 consecutive day period, for burning in connection with pressure valve releases for control over process upsets.
This is an enclosed flare.
Which Months: All Year Statistical Basis: None specified

122 [LAC 33:III.1105] Submit notification: Due to the Office of Environmental Compliance as soon as possible after the start of burning of pressure valve releases for control over process upsets. Notify in accordance with LAC 33:I.3923. Notification is required only if the upset cannot be controlled in six hours.

123 [LAC 33:III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: Six-minute average

124 [LAC 33:III.2108.C.2] VOC, Total >= 95 % reduction by weight.
Regulation requires 90% efficiency for compliance, but the facility is claiming 95% efficiency for this enclosed flare.
Which Months: All Year Statistical Basis: None specified

125 [LAC 33:III.2108.E.1.b] Determine compliance with LAC 33:III.2108.C.3 using the methods in LAC 33:III.2108.E.1-5, as appropriate.
Since this enclosed flare is not a "typical" flare, a more stringent and suitable testing method will be used to show compliance.
Facility will use methods 25A or 25B (40 CFR 60 Appendix A) covered under LAC 33:III.2108.E.1.b.

126 [LAC 33:III.2108.F.1] Submit test results: Due to the Office of Environmental Services within 45 days of any testing done in accordance with LAC 33:III.2108.E.

127 [LAC 33:III.2108.F.2] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2108.F.2.a-e.

128 [LAC 33:III.507.H.1.a] In order to show continuous compliance, the No. 1 Dock Thermal Treatment Unit's temperature shall be monitored as the operating parameter. A continuous parameter monitoring system (CPMS) capable of measuring temperature shall be installed in the firebox or in the ductwork immediately downstream from the firebox in a position before any substantial heat exchange occurs.
The CPMS shall be calibrated, certified, operated, and maintained according to the manufacturer's specifications.

129 [LAC 33:III.507.H.1.a] Temperature > 1100 F, to ensure destruction of emissions.
Which Months: All Year Statistical Basis: None specified

130 [LAC 33:III.507.H.1.a] Temperature monitored by continuous parameter monitoring system (CPMS) during loading of Dripolene to ensure the temperature stays above 1100 °F. The temperature shall be monitored in the stack of the flare during times of operation to ensure proper operation. When the temperature of the dock enclosed flare (EPN 668) drops below 1100 °F, more fuel gas shall be automatically added to increase the temperature. At this temperature, according to the manufacturer's design, the flare should meet the required destruction efficiency.
Which Months: All Year Statistical Basis: Constant

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

EQT 0054 668 - No. 1 Dock Thermal Treatment Unit

- 131 [LAC 33:III.507.H.1.a] The No. 1 Dock Thermal Treatment Unit, Emission Point 668, shall be lighted prior to loading from the No. 1 Dock, Emission Point 625A. During No. 1 Dock Thermal Treatment Unit's idle times, the flare may be shut down.

EQT 0056 3407 - Overland Amines Scrubber

- 132 [LAC 33:III.501.C.6] Flow rate $\geq$ 4 gallons/min.
Which Months: All Year Statistical Basis: None specified
- 133 [LAC 33:III.507.H.1.a] Flow rate monitored by flow rate monitoring device at the approved frequency.
Permittee shall maintain the claimed 80% efficiency by monitoring and recording the flow rate at least once per 12 hour shift.
Which Months: All Year Statistical Basis: None specified
- 134 [LAC 33:III.507.H.1.a] Flow rate recordkeeping by electronic or hard copy at the approved frequency. Flow rates shall be monitored and recorded at least once per 12 hour shift.
- 135 [LAC 33:III.507.H.1.a] Submit report : Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division.
- 136 [LAC 33:III.507.H.1.a] Water monitored by the regulation's specified method(s) during loading.
Permittee shall maintain the claimed efficiency (80% or better) by continuously adding water to the scrubber.
Which Months: All Year Statistical Basis: None specified
- 137 [LAC 33:III.507.H.1.a] Water recordkeeping by electronic or hard copy at the regulation's specified frequency.
Permittee shall record every time the used water is replaced with fresh water per 12 hour shift.

EQT 0057 3409 - No. 2 Dock Amines Scrubber

- 138 [LAC 33:III.501.C.6] Flow rate $\geq$ 75 gallons/min.
Loading activities will automatically shutdown if pump rate is less than 75 gallons per minute.
Which Months: All Year Statistical Basis: None specified
- 139 [LAC 33:III.507.H.1.a] Flow rate monitored by flow rate monitoring device during loading of containers continuously. Permittee shall maintain claimed efficiency (80% or better) by maintaining flow rate between 75 and 110 gals/min, by automatically shutting down loading activity when flow rate falls below 75 gals/min, and emptying water after each loading event.
Which Months: All Year Statistical Basis: None specified
- 140 [LAC 33:III.507.H.1.a] Flow rate recordkeeping by electronic or hard copy during loading continuously.
- 141 [LAC 33:III.507.H.1.a] Submit report : Due annually, by the 31st of March for the preceding calendar year. List the hours the pump rate fell below 75 gallons/minute and the hours the loading operation shutdown automatically. Submit report to the Office of Environmental Compliance, Enforcement Division.
- 142 [LAC 33:III.507.H.1.a] Water monitored by the regulation's specified method(s) during loading.
Permittee shall maintain the claimed efficiency (80% or better) by emptying the scrubbing media (treated water) after each loading event.
Which Months: All Year Statistical Basis: None specified
- 143 [LAC 33:III.507.H.1.a] Water recordkeeping by electronic or hard copy at the regulation's specified frequency.
Permittee shall record every time the used water is replaced with fresh water prior to loading.

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

EQT 0058 3410 - EDA Scrubber

- | | | |
|-----|------------------------|---|
| 144 | [LAC 33:III.501.C.6] | To maintain the claimed efficiency (75% or better), the permittee shall maintain Flow rate $\geq$ 80 gallons/min and the scrubbing agent shall be pumped out and recharged at least once weekly. |
| 145 | [LAC 33:III.507.H.1.a] | Which Months: All Year Statistical Basis: None specified
Flow rate monitored by flow rate monitoring device once every shift during operation. |
| 146 | [LAC 33:III.507.H.1.a] | Which Months: All Year Statistical Basis: None specified
Flow rate recordkeeping by electronic or hard copy once every shift during operation. |
| 147 | [LAC 33:III.507.H.1.a] | Submit report : Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. |
| 148 | [LAC 33:III.507.H.1.a] | Water monitored by the regulation's specified method(s) during loading.
Permittee shall monitor that the scrubbing agent is pumped out and recharged at least once weekly.
Which Months: All Year Statistical Basis: None specified |
| 149 | [LAC 33:III.507.H.1.a] | Water recordkeeping by electronic or hard copy at the regulation's specified frequency.
Permittee shall record every time the scrubbing agent is recharged (treated water replaced). |

EQT 0059 3414 - Acrylate Thermal Treatment Unit

- | | | |
|-----|-----------------------------|--|
| 150 | [40 CFR 63.2346(a)(1)] | Comply with all applicable provisions of 40 CFR 63 Subpart EEEE. [40 CFR 63.2346(a)(1)] |
| 151 | [40 CFR 63.2346(a)(1)] | Comply with all applicable requirements as specified in NESHAP Subpart SS. Subpart EEEE. [40 CFR 63.2346(a)(1)] |
| 152 | [40 CFR 63.2386] | Comply with all applicable reporting in 40 CFR 63.2386 (a) through (j), as applicable. Subpart EEEE. |
| 153 | [40 CFR 63.983(a)(1)] | Closed-vent systems: Ensure that each closed-vent system is designed and operated to collect the regulated material vapors from the emission point, and to route the collected vapors to a control device. Subpart SS. [40 CFR 63.983(a)(1)] |
| 154 | [40 CFR 63.983(a)(2)] | Closed-vent systems: Operate at all times when emissions are vented to, or collected by, them. Subpart SS. [40 CFR 63.983(a)(2)] |
| 155 | [40 CFR 63.983(a)(3)(i)] | Closed-vent systems (containing bypass lines): Flow monitored by flow indicator at the regulation's specified frequency. Ensure that the flow indicator is capable of taking periodic readings. Install at the entrance to any bypass line. Subpart SS. [40 CFR 63.983(a)(3)(i)]
Which Months: All Year Statistical Basis: None specified |
| 156 | [40 CFR 63.983(a)(3)(ii)] | Closed-vent systems (containing bypass lines): Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. Subpart SS. [40 CFR 63.983(a)(3)(ii)] |
| 157 | [40 CFR 63.983(a)(4)] | Closed-vent systems: Ensure that each closed-vent system is designed and operated so that the regulated material vapors collected at one loading arm will not pass through another loading arm in the rack to the atmosphere. Subpart SS. [40 CFR 63.983(a)(4)] |
| 158 | [40 CFR 63.983(a)(5)] | Closed-vent systems: Ensure that no pressure relief device opens to the atmosphere during loading. Subpart SS. [40 CFR 63.983(a)(5)] |
| 159 | [40 CFR 63.983(b)(1)(i)(A)] | Closed-vent systems (hard-piping): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once initially. If an instrument reading of 500 ppmv above background is measured, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.983(d)(2). Subpart SS. [40 CFR 63.983(b)(1)(i)(A)]
Which Months: All Year Statistical Basis: None specified |

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

EQT 0059 3414 - Acrylate Thermal Treatment Unit

- 160 [40 CFR 63.983(b)(1)(i)(B)] Closed-vent systems (hard-piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart SS. [40 CFR 63.983(b)(1)(i)(B)]
Which Months: All Year Statistical Basis: None specified
- 161 [40 CFR 63.983(b)(1)(ii)] Closed-vent systems (ductwork): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once initially and annually. If an instrument reading of 500 ppmv above background is measured, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.983(d)(2). Subpart SS. [40 CFR 63.983(b)(1)(ii)]
Which Months: All Year Statistical Basis: None specified
- 162 [40 CFR 63.983(b)(2)(i)] Closed-vent systems (unsafe-to-monitor): Determine that the equipment is unsafe-to-inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with 40 CFR 63.983(b)(1). Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(2)(i)]
- 163 [40 CFR 63.983(b)(2)(ii)] Closed-vent systems (unsafe-to-monitor): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment as frequently as practical during safe-to-inspect times, at least once annually. Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(2)(ii)]
Which Months: All Year Statistical Basis: None specified
- 164 [40 CFR 63.983(b)(3)(i)] Closed-vent systems (difficult-to-monitor): Determine that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters (7 feet) above a support surface. Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(3)(i)]
- 165 [40 CFR 63.983(b)(3)(ii)] Closed-vent systems (difficult-to-monitor): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment at least once every 5 years. Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(3)(ii)]
Which Months: All Year Statistical Basis: None specified
- 166 [40 CFR 63.983(b)(4)(i)] Closed-vent systems (containing bypass lines): Flow recordkeeping by electronic or hard copy once every 15 minutes. Subpart SS. [40 CFR 63.983(b)(4)(i)]
- 167 [40 CFR 63.983(b)(4)(ii)] Closed-vent systems (containing bypass lines): Equipment/operational data monitored by visual inspection/determination monthly. Visually inspect the seal or closure mechanism at least once every month to verify that the valve is maintained in the non-diverting position, and the vent stream is not diverted through the bypass line. Subpart SS. [40 CFR 63.983(b)(4)(ii)]
Which Months: All Year Statistical Basis: None specified
- 168 [40 CFR 63.983(d)(1)] Closed-vent systems (hard piping): Eliminate leak, or monitor according to the procedures in 40 CFR 63.983(c), if there are visible, audible, or olfactory indications of leaks at the time of the annual visual inspections required by 40 CFR 63.983(b)(1)(i)(B). Subpart SS. [40 CFR 63.983(d)(1)]
- 169 [40 CFR 63.983(d)(2)] Closed-vent systems: Repair leaks as soon as practical, except as provided in 40 CFR 63.983(d)(3). Make a first attempt at repair no later than 5 days after the leak is detected, and complete repairs no later than 15 days after the leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later. Subpart SS. [40 CFR 63.983(d)(2)]
- 170 [40 CFR 63.983(d)(3)] Closed-vent systems (delay of repair allowed): Repair equipment as soon as practical, but not later than the end of the next closed-vent system shutdown. Subpart SS. [40 CFR 63.983(d)(3)]

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

EQT 0059 3414 - Acrylate Thermal Treatment Unit

- 171 [40 CFR 63.985(a)] Operate and maintain so that the monitored parameters defined as required in 40 CFR 63.985(c) remain within the ranges specified in the Notification of Compliance Status whenever emissions of regulated material are routed to the control device except during periods of start-up, shutdown, and malfunction as specified in the referencing subpart. Subpart SS. [40 CFR 63.985(a)]
- 172 [40 CFR 63.985(b)(1)] Prepare and submit with the Notification of Compliance Status, as specified in 40 CFR 63.999(b)(2), either a design evaluation that includes the information specified in 40 CFR 63.985(b)(1)(i), or the results of the performance test as described in 40 CFR 63.985(b)(1)(ii). Subpart SS. [40 CFR 63.985(b)(1)]
- 173 [40 CFR 63.985(c)(2)] Monitor the parameters specified in the Notification of Compliance Status or in the operating permit application or amendment. Subpart SS. [40 CFR 63.985(c)(2)]
- 174 [40 CFR 63.988(c)(1)] Temperature monitored by continuous parameter monitoring system (CPMS) continuously. Install the temperature monitoring device in the fire box or in the ductwork immediately downstream of the fire box in a position before any substantial heat exchange occurs. Subpart SS
- NOTE:
Facility will maintain a constant flame temperature to 1400 degrees F or higher when in operation so as to achieve destruction efficiency claimed by manufacturer. [40 CFR 63.988(c)(1)]
Which Months: All Year Statistical Basis: None specified
- 175 [40 CFR 63.995(b)] If conducting an initial performance test as per 40 CFR 63.985(b)(1)(ii) instead of the design evaluation as per 40 CFR 63.985(b)(1)(i), then conduct an initial performance test according to the procedures in 40 CFR 63.997. Subpart SS. [40 CFR 63.995(b)]
- 176 [40 CFR 63.995(c)] Submit a description of planned monitoring, recordkeeping and reporting procedures as specified in a referencing subpart. Subpart SS. [40 CFR 63.995(c)]
- 177 [40 CFR 63.998] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.998(a) through (d), as applicable. Subpart SS.
- 178 [40 CFR 63.999(a)(1)(i)] Notify DEQ of the intention to conduct a performance test or flare compliance assessment: Due at least 30 days before such a compliance demonstration is scheduled to allow DEQ the opportunity to have an observer present. Notify DEQ as soon as possible of any delay in the original demonstration date, if after 30 days notice for such an initially scheduled compliance demonstration, there is a delay (due to operational problems, etc.) in conducting the scheduled compliance demonstration. Provide at least 7 days prior notice of the rescheduled date of the compliance demonstration, or arrange a rescheduled date with DEQ by mutual agreement. Subpart SS. [40 CFR 63.999(a)(1)(i)]
- 179 [40 CFR 63.999(a)(1)(ii)] Submit performance test and flare compliance assessment reports, if not submitted as part of a Notification of Compliance Status report, to DEQ within 60 days of completing the test or determination, unless specified differently. Include the information specified in 40 CFR 63.999(a)(2)(i) through (a)(2)(iii). Subpart SS. [40 CFR 63.999(a)(1)(ii)]
- 180 [40 CFR 63.999(a)(1)(iii)] Submit application for a waiver of an initial performance test or flare compliance assessment, as allowed by 40 CFR 63.997(b)(2), no later than 90 days before the performance test or compliance assessment is required. Include information justifying the request for a waiver, such as the technical or economic infeasibility, or the impracticality, of the source performing the test. Subpart SS. [40 CFR 63.999(a)(1)(iii)]
- 181 [40 CFR 63.999(a)(1)(iv)] Submit application to substitute a prior performance test or compliance assessment for an initial performance test or compliance assessment, as allowed by 40 CFR 63.997(b)(1), no later than 90 days before the performance test or compliance test is required. Include information demonstrating that the prior performance test or compliance assessment was conducted using the same methods specified in 40 CFR 63.997(e) or 40 CFR 63.987(b)(3), as applicable. Also include information demonstrating that no process changes have been made since the test, or that the results of the performance test or compliance assessment reliably demonstrate compliance despite process changes. Subpart SS. [40 CFR 63.999(a)(1)(iv)]

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

EQT 0059 3414 - Acrylate Thermal Treatment Unit

- 182 [40 CFR 63.999(b)] Submit Notification of Compliance Status: Due as specified in the referencing subpart. Include the information specified in 40 CFR 63.999(b)(1) through (b)(5), as applicable. Subpart SS. [40 CFR 63.999(b)]
- 183 [40 CFR 63.999(c)] Submit Periodic Report: Due as specified in the referencing subpart. Include the information specified in 40 CFR 63.999(c)(1) through (c)(7). Subpart SS. [40 CFR 63.999(c)]
- 184 [40 CFR 63.999(d)(1)] Submit request for approval to use alternatives to continuous operating parameter monitoring and recordkeeping provisions, as provided for in 40 CFR 63.996(d)(1), as specified in a referencing subpart. Include the information specified in 40 CFR 63.999(d)(1)(i) and (d)(1)(ii). Subpart SS. [40 CFR 63.999(d)(1)]
- 185 [40 CFR 63.999(d)(2)] Submit request for approval to monitor a different parameter than those established in 40 CFR 63.996(c)(6) or to set unique monitoring parameters, as provided for in 40 CFR 63.996(d)(2), as specified as specified in a referencing subpart. Include the information specified in 40 CFR 63.999(d)(2)(i) through (d)(2)(iii). Subpart SS. [40 CFR 63.999(d)(2)]
- 186 [LAC 33:III.1105] Opacity <= 20 percent, except for a combined total of six hours in any 10 consecutive day period, for burning in connection with pressure valve releases for control over process upsets.
Which Months: All Year Statistical Basis: None specified
- 187 [LAC 33:III.1105] Submit notification: Due to the Office of Environmental Compliance as soon as possible after the start of burning of pressure valve releases for control over process upsets. Notify in accordance with LAC 33:I.3923. Notification is required only if the upset cannot be controlled in six hours.
- 188 [LAC 33:III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: Six-minute average

EQT 0066 635 - Tank 6220 (vents to UCC Olefins 1 & 2 flares)

- 189 [40 CFR 63.1103(e)(3), Table 7] Organic HAP >= 98 % reduction by weight by venting emissions through a closed-vent system to any combination of control devices, and meet the requirements of 40 CFR 63.982(a)(1). Subpart YY. [40 CFR 63.1103(e)(3), Table 7 item(c)(1)(i)&(ii)]
Which Months: All Year Statistical Basis: None specified
- 190 [LAC 33:III.2103.B] Equip with a submerged fill pipe.
- 191 [LAC 33:III.2103.E.1] VOC, Total >= 95 % control efficiency using a vapor loss control system. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: None specified
- 192 [LAC 33:III.2103.E] Equip with a vapor loss control system that consists of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. Ensure that all tank gauging and sampling devices are gas-tight except when gauging or sampling is taking place.
- 193 [LAC 33:III.2103.F] No person shall place, store or hold in any stationary tank, reservoir or other container of more than 40,000 gallons (151,400 liters) nominal capacity any volatile organic compound having a true vapor pressure of 11 psia or greater at storage conditions unless such tank, reservoir or other container is a pressure tank capable of maintaining working pressures sufficient at all times under normal operating conditions to prevent vapor or gas loss to the atmosphere or is designed and equipped with a submerged fill pipe and vapor loss control system in accordance with LAC 33:III.2103.E.

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

EQT 0066 635 - Tank 6220 (vents to UCC Olefins 1 & 2 flares)

- 194 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 195 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 through I.7, as applicable. Maintain records for at least two years.

EQT 0067 635A - Tank 6210 (vents to UCC Olefins 1 & 2 flares)

- 196 [40 CFR 63.1103(e)(3), Table 7] Organic HAP $\geq$ 98 % reduction by weight by venting emissions through a closed-vent system to any combination of control devices, and meet the requirements of 40 CFR 63.982(a)(1). Subpart YY. [40 CFR 63.1103(e)(3), Table 7 item(c)(1)(i)&(ii)]
- 197 [LAC 33:III.2103.B] Which Months: All Year Statistical Basis: None specified
- 198 [LAC 33:III.2103.E.1] Equip with a submerged fill pipe.
- VOC, Total $\geq$ 95 % control efficiency using a vapor loss control system. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
- 199 [LAC 33:III.2103.E] Which Months: All Year Statistical Basis: None specified
- Equip with a vapor loss control system that consists of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. Ensure that all tank gauging and sampling devices are gas-tight except when gauging or sampling is taking place.
- 200 [LAC 33:III.2103.F] No person shall place, store or hold in any stationary tank, reservoir or other container of more than 40,000 gallons (151,400 liters) nominal capacity any volatile organic compound having a true vapor pressure of 11 psia or greater at storage conditions unless such tank, reservoir or other container is a pressure tank capable of maintaining working pressures sufficient at all times under normal operating conditions to prevent vapor or gas loss to the atmosphere or is designed and equipped with a submerged fill pipe and vapor loss control system in accordance with LAC 33:III.2103.E.
- 201 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 202 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 through I.7, as applicable. Maintain records for at least two years.

EQT 0076 3427 - Acrylate Thermal Treatment Unit

- 203 [40 CFR 63.2346(a)(1)] Comply with all applicable provisions of 40 CFR 63 Subpart EEEE. [40 CFR 63.2346(a)(1)]
- 204 [40 CFR 63.2346(a)(1)] Comply with all applicable requirements as specified in NESHAP Subpart SS. Subpart EEEE. [40 CFR 63.2346(a)(1)]
- 205 [40 CFR 63.2386] Comply with all applicable reporting in 40 CFR 63.2386 (a) through (j), as applicable. Subpart EEEE.
- 206 [40 CFR 63.983(a)(1)] Closed-vent systems: Ensure that each closed-vent system is designed and operated to collect the regulated material vapors from the emission point, and to route the collected vapors to a control device. Subpart SS. [40 CFR 63.983(a)(1)]
- 207 [40 CFR 63.983(a)(2)] Closed-vent systems: Operate at all times when emissions are vented to, or collected by, them. Subpart SS. [40 CFR 63.983(a)(2)]
- 208 [40 CFR 63.983(a)(3)(i)] Closed-vent systems (containing bypass lines): Flow monitored by flow indicator at the regulation's specified frequency. Ensure that the flow indicator is capable of taking periodic readings. Install at the entrance to any bypass line. Subpart SS. [40 CFR 63.983(a)(3)(i)]
- Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

EQT 0076 3427 - Acrylate Thermal Treatment Unit

- 209 [40 CFR 63.983(a)(3)(ii)] Closed-vent systems (containing bypass lines): Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. Subpart SS. [40 CFR 63.983(a)(3)(ii)]
- 210 [40 CFR 63.983(a)(4)] Closed-vent systems: Ensure that each closed-vent system is designed and operated so that the regulated material vapors collected at one loading arm will not pass through another loading arm in the rack to the atmosphere. Subpart SS. [40 CFR 63.983(a)(4)]
- 211 [40 CFR 63.983(a)(5)] Closed-vent systems: Ensure that no pressure relief device opens to the atmosphere during loading. Subpart SS. [40 CFR 63.983(a)(5)]
- 212 [40 CFR 63.983(b)(1)(i)(A)] Closed-vent systems (hard-piping): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once initially. If an instrument reading of 500 ppmv above background is measured, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.983(d)(2). Subpart SS. [40 CFR 63.983(b)(1)(i)(A)]
- 213 [40 CFR 63.983(b)(1)(i)(B)] Which Months: All Year Statistical Basis: None specified
Closed-vent systems (hard-piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart SS. [40 CFR 63.983(b)(1)(i)(B)]
- 214 [40 CFR 63.983(b)(1)(ii)] Which Months: All Year Statistical Basis: None specified
Closed-vent systems (ductwork): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once initially and annually. If an instrument reading of 500 ppmv above background is measured, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.983(d)(2). Subpart SS. [40 CFR 63.983(b)(1)(ii)]
- 215 [40 CFR 63.983(b)(2)(i)] Which Months: All Year Statistical Basis: None specified
Closed-vent systems (unsafe-to-monitor): Determine that the equipment is unsafe-to-inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with 40 CFR 63.983(b)(1). Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(2)(i)]
- 216 [40 CFR 63.983(b)(2)(ii)] Closed-vent systems (unsafe-to-monitor): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment as frequently as practical during safe-to-inspect times, at least once annually. Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(2)(ii)]
- 217 [40 CFR 63.983(b)(3)(i)] Which Months: All Year Statistical Basis: None specified
Closed-vent systems (difficult-to-monitor): Determine that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters (7 feet) above a support surface. Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(3)(i)]
- 218 [40 CFR 63.983(b)(3)(ii)] Closed-vent systems (difficult-to-monitor): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment at least once every 5 years. Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(3)(ii)]
- 219 [40 CFR 63.983(b)(4)(i)] Which Months: All Year Statistical Basis: None specified
Closed-vent systems (containing bypass lines): Flow recordkeeping by electronic or hard copy once every 15 minutes. Subpart SS. [40 CFR 63.983(b)(4)(i)]
- 220 [40 CFR 63.983(b)(4)(ii)] Closed-vent systems (containing bypass lines): Equipment/operational data monitored by visual inspection/determination monthly. Visually inspect the seal or closure mechanism at least once every month to verify that the valve is maintained in the non-diverting position, and the vent stream is not diverted through the bypass line. Subpart SS. [40 CFR 63.983(b)(4)(ii)]
- Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

EQT 0076 3427 - Acrylate Thermal Treatment Unit

- 221 [40 CFR 63.983(d)(1)] Closed-vent systems (hard piping): Eliminate leak, or monitor according to the procedures in 40 CFR 63.983(c), if there are visible, audible, or olfactory indications of leaks at the time of the annual visual inspections required by 40 CFR 63.983(b)(1)(i)(B). Subpart SS. [40 CFR 63.983(d)(1)]
- 222 [40 CFR 63.983(d)(2)] Closed-vent systems: Repair leaks as soon as practical, except as provided in 40 CFR 63.983(d)(3). Make a first attempt at repair no later than 5 days after the leak is detected, and complete repairs no later than 15 days after the leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later. Subpart SS. [40 CFR 63.983(d)(2)]
- 223 [40 CFR 63.983(d)(3)] Closed-vent systems (delay of repair allowed): Repair equipment as soon as practical, but not later than the end of the next closed-vent system shutdown. Subpart SS. [40 CFR 63.983(d)(3)]
- 224 [40 CFR 63.985(a)] Operate and maintain so that the monitored parameters defined as required in 40 CFR 63.985(c) remain within the ranges specified in the Notification of Compliance Status whenever emissions of regulated material are routed to the control device except during periods of start-up, shutdown, and malfunction as specified in the referencing subpart. Subpart SS. [40 CFR 63.985(a)]
- 225 [40 CFR 63.985(b)(1)] Prepare and submit with the Notification of Compliance Status, as specified in 40 CFR 63.999(b)(2), either a design evaluation that includes the information specified in 40 CFR 63.985(b)(1)(i), or the results of the performance test as described in 40 CFR 63.985(b)(1)(ii). Subpart SS. [40 CFR 63.985(b)(1)]
- 226 [40 CFR 63.985(c)(2)] Monitor the parameters specified in the Notification of Compliance Status or in the operating permit application or amendment. Subpart SS. [40 CFR 63.985(c)(2)]
- 227 [40 CFR 63.988(c)(1)] Temperature monitored by continuous parameter monitoring system (CPMS) continuously. Install the temperature monitoring device in the fire box or in the ductwork immediately downstream of the fire box in a position before any substantial heat exchange occurs. Subpart SS
- NOTE:
Facility will maintain a constant flame temperature to 1400 degrees F or higher when in operation so as to achieve destruction efficiency claimed by manufacturer. [40 CFR 63.988(c)(1)]
- 228 [40 CFR 63.995(b)] Which Months: All Year Statistical Basis: None specified
If conducting an initial performance test as per 40 CFR 63.985(b)(1)(ii) instead of the design evaluation as per 40 CFR 63.985(b)(1)(i), then conduct an initial performance test according to the procedures in 40 CFR 63.997. Subpart SS. [40 CFR 63.995(b)]
- 229 [40 CFR 63.995(c)] Submit a description of planned monitoring, recordkeeping and reporting procedures as specified in a referencing subpart. Subpart SS. [40 CFR 63.995(c)]
- 230 [40 CFR 63.998] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.998(a) through (d), as applicable. Subpart SS.
- 231 [40 CFR 63.999(a)(1)(i)] Notify DEQ of the intention to conduct a performance test or flare compliance assessment: Due at least 30 days before such a compliance demonstration is scheduled to allow DEQ the opportunity to have an observer present. Notify DEQ as soon as possible of any delay in the original demonstration date, if after 30 days notice for such an initially scheduled compliance demonstration, there is a delay (due to operational problems, etc.) in conducting the scheduled compliance demonstration. Provide at least 7 days prior notice of the rescheduled date of the compliance demonstration, or arrange a rescheduled date with DEQ by mutual agreement. Subpart SS. [40 CFR 63.999(a)(1)(i)]
- 232 [40 CFR 63.999(a)(1)(ii)] Submit performance test and flare compliance assessment reports, if not submitted as part of a Notification of Compliance Status report, to DEQ within 60 days of completing the test or determination, unless specified differently. Include the information specified in 40 CFR 63.999(a)(2)(i) through (a)(2)(iii). Subpart SS. [40 CFR 63.999(a)(1)(ii)]

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

EQT 0076 3427 - Acrylate Thermal Treatment Unit

- 233 [40 CFR 63.999(a)(1)(iii)] Submit application for a waiver of an initial performance test or flare compliance assessment, as allowed by 40 CFR 63.997(b)(2), no later than 90 days before the performance test or compliance assessment is required. Include information justifying the request for a waiver, such as the technical or economic infeasibility, or the impracticality, of the source performing the test. Subpart SS. [40 CFR 63.999(a)(1)(iii)]
- 234 [40 CFR 63.999(a)(1)(iv)] Submit application to substitute a prior performance test or compliance assessment for an initial performance test or compliance assessment, as allowed by 40 CFR 63.997(b)(1), no later than 90 days before the performance test or compliance test is required. Include information demonstrating that the prior performance test or compliance assessment was conducted using the same methods specified in 40 CFR 63.997(e) or 40 CFR 63.987(b)(3), as applicable. Also include information demonstrating that no process changes have been made since the test, or that the results of the performance test or compliance assessment reliably demonstrate compliance despite process changes. Subpart SS. [40 CFR 63.999(a)(1)(iv)]
- 235 [40 CFR 63.999(b)] Submit Notification of Compliance Status: Due as specified in the referencing subpart. Include the information specified in 40 CFR 63.999(b)(1) through (b)(5), as applicable. Subpart SS. [40 CFR 63.999(b)]
- 236 [40 CFR 63.999(c)] Submit Periodic Report: Due as specified in the referencing subpart. Include the information specified in 40 CFR 63.999(c)(1) through (c)(7). Subpart SS. [40 CFR 63.999(c)]
- 237 [40 CFR 63.999(d)(1)] Submit request for approval to use alternatives to continuous operating parameter monitoring and recordkeeping provisions, as provided for in 40 CFR 63.996(d)(1), as specified in a referencing subpart. Include the information specified in 40 CFR 63.999(d)(1)(i) and (d)(1)(ii). Subpart SS. [40 CFR 63.999(d)(1)]
- 238 [40 CFR 63.999(d)(2)] Submit request for approval to monitor a different parameter than those established in 40 CFR 63.996(c)(6) or to set unique monitoring parameters, as provided for in 40 CFR 63.996(d)(2), as specified as specified in a referencing subpart. Include the information specified in 40 CFR 63.999(d)(2)(i) through (d)(2)(iii). Subpart SS. [40 CFR 63.999(d)(2)]
- 239 [LAC 33:III.1105] Opacity <= 20 percent, except for a combined total of six hours in any 10 consecutive day period, for burning in connection with pressure valve releases for control over process upsets.
Which Months: All Year Statistical Basis: None specified
- 240 [LAC 33:III.1105] Submit notification: Due to the Office of Environmental Compliance as soon as possible after the start of burning of pressure valve releases for control over process upsets. Notify in accordance with LAC 33:I.3923. Notification is required only if the upset cannot be controlled in six hours.
- 241 [LAC 33:III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: Six-minute average

FUG 0001 - Equipment Fugitive Emissions

- 242 [40 CFR 63.162(c)] Identify each piece of equipment in a process unit such that it can be distinguished readily from equipment that is not subject to 40 CFR 63 Subpart H. Subpart H. [40 CFR 63.162(c)]

SPECIFIC REQUIREMENTS**AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles****Activity Number: PER20220001****Permit Number: 2520-00186-V1****Air - Title V Regular Permit Minor Mod****FUG 0001 - Equipment Fugitive Emissions**

- 243 [40 CFR 63.162(f)] Clearly identify leaking equipment, for leaking equipment detected as specified in 40 CFR 63.163, 40 CFR 63.164, 40 CFR 63.168, 40 CFR 63.169, and 40 CFR 63.172 through 63.174. The identification may be removed after the equipment is repaired, except for valves or for connectors subject to 40 CFR 63.174(c)(1)(i). The identification on a valve may be removed after it has been monitored as specified in 40 CFR 63.168(f)(3) and 63.175(e)(i)(D), and no leak has been detected during the follow-up monitoring. If electing to comply using the provisions of 40 CFR 63.174(c)(1)(i), the identification on a connector may be removed after it is monitored as specified in 40 CFR 63.174(c)(1)(i) and no leak is detected during that monitoring. Subpart H. [40 CFR 63.162(f)]
- 244 [40 CFR 63.163(b)(1)] Pumps in light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 monthly to detect leaks, except as provided in 40 CFR 63.162(b) and 63.163(e) through (j). If a reading of 10,000 ppm (phase I); 5,000 ppm (phase II); or 5,000 ppm (phase III, pumps handling polymerizing monomers), 2,000 ppm (phase III, pumps in food/medical service), or 1,000 ppm (phase III, all other pumps) or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.163(c). Subpart H. [40 CFR 63.163(b)(1)]
Which Months: All Year Statistical Basis: None specified
- 245 [40 CFR 63.163(b)(3)] Pumps in light liquid service: Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate the repair provisions specified in 40 CFR 63.163(c). Subpart H. [40 CFR 63.163(b)(3)]
Which Months: All Year Statistical Basis: None specified
- 246 [40 CFR 63.163(c)] Pumps in light liquid service: Make a first attempt at repair no later than 5 calendar days after a leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.163(c)(3) and 40 CFR 63.171. Subpart H. [40 CFR 63.163(c)]
- 247 [40 CFR 63.163(d)(2)] Pumps in light liquid service: Implement a quality improvement program for pumps that complies with the requirements of 40 CFR 63.176, if, in Phase III, calculated on a 6-month rolling average, the greater of either 10 percent of the pumps in a process unit or three pumps in a process unit leak. Subpart H. [40 CFR 63.163(d)(2)]
- 248 [40 CFR 63.163(d)(4)] Pumps in light liquid service: Determine percent leaking pumps using the equation in 40 CFR 63.163(d)(4). Subpart H. [40 CFR 63.163(d)(4)]
- 249 [40 CFR 63.163(e)(1)] Pumps in light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure; or equip with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of 40 CFR 63.172; or equip with a closed-loop system that purges the barrier fluid into a process stream. Subpart H. [40 CFR 63.163(e)(1)]
- 250 [40 CFR 63.163(e)(2)] Pumps in light liquid service (dual mechanical seal system): Ensure that the barrier fluid is not in light liquid service. Subpart H. [40 CFR 63.163(e)(2)]
- 251 [40 CFR 63.163(e)(3)] Pumps in light liquid service (dual mechanical seal system): Equip barrier fluid system with a sensor that will detect failure of the seal system, barrier fluid system, or both. Subpart H. [40 CFR 63.163(e)(3)]
- 252 [40 CFR 63.163(e)(4)] Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the pump seal. If there are indications of liquid dripping from the pump seal at the time of the weekly inspection, monitor the pump as specified in 40 CFR 63.180(b) to determine if there is a leak of organic HAP in the barrier fluid. If an instrument reading of 1,000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate the repair provisions in 40 CFR 63.163(e)(6). Subpart H. [40 CFR 63.163(e)(4)]
Which Months: All Year Statistical Basis: None specified
- 253 [40 CFR 63.163(e)(6)(i)] Pumps in light liquid service (dual mechanical seal system): Determine, based on design considerations and operating experience, criteria that indicates failure of the seal system, the barrier fluid system, or both. Subpart H. [40 CFR 63.163(e)(6)(i)]

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

FUG 0001 - Equipment Fugitive Emissions

- 254 [40 CFR 63.163(e)(6)] Pumps in light liquid service (dual mechanical seal system): Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.163(e)(6)]
- 255 [40 CFR 63.163(e)] Pumps in light liquid service (dual mechanical seal system - sensor): Equipment/operational data monitored by visual inspection/determination daily, or equip with an audible alarm unless the pump is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criteria established in 40 CFR 63.163(e)(6), a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.163(e)(6). Subpart H. [40 CFR 63.163(e)]
Which Months: All Year Statistical Basis: None specified
- 256 [40 CFR 63.163(j)(1)] Pumps in light liquid service (unsafe-to-monitor): Determine that the pump is unsafe-to-monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.163(b) through (d). Subpart H. [40 CFR 63.163(j)(1)]
- 257 [40 CFR 63.163(j)(2)] Pumps in light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the pump as frequently as practicable during safe-to-monitor times but not more frequently than the periodic monitoring schedule otherwise applicable. Subpart H. [40 CFR 63.163(j)(2)]
Which Months: All Year Statistical Basis: None specified
- 258 [40 CFR 63.164(a)] Compressors: Equip with a seal system that includes a barrier fluid system and that prevents leakage of process fluid to the atmosphere, except as provided in 40 CFR 63.162(b) and 40 CFR 63.164(h) and (i). Subpart H. [40 CFR 63.164(a)]
- 259 [40 CFR 63.164(b)] Compressors: Operate the seal system with the barrier fluid at a pressure that is greater than the compressor stuffing box pressure; or equip with a barrier fluid system degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of 40 CFR 63.172; or equip with a closed-loop system that purges the barrier fluid directly into a process stream. Subpart H. [40 CFR 63.164(b)]
- 260 [40 CFR 63.164(c)] Compressors: Ensure that the barrier fluid is not in light liquid service. Subpart H. [40 CFR 63.164(c)]
- 261 [40 CFR 63.164(d)] Compressors: Equip each barrier fluid system as described in 40 CFR 63.164(a) through (c) with a sensor that will detect failure of the seal system, barrier fluid system, or both. Subpart H. [40 CFR 63.164(d)]
- 262 [40 CFR 63.164(e)(2)] Compressors (sensor): Determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both. Subpart H. [40 CFR 63.164(e)(2)]
- 263 [40 CFR 63.164(g)] Compressors: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after each leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.164(g)]
- 264 [40 CFR 63.164(i)(2)] Compressors (no detectable emissions): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially and annually, and at other times requested by DEQ. Subpart H. [40 CFR 63.164(i)(2)]
Which Months: All Year Statistical Basis: None specified
- 265 [40 CFR 63.164] Compressors (sensor): Equipment/operational data monitored by visual inspection/determination daily, or equip with an alarm, unless the compressor is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criterion determined under 40 CFR 63.164(e)(2), a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.164(g). Subpart H.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

FUG 0001 - Equipment Fugitive Emissions

- 266 [40 CFR 63.165(a)] Pressure relief device in gas/vapor service: Organic HAP < 500 ppm above background except during pressure releases, as determined by the method specified in 63.180(c). Subpart H. [40 CFR 63.165(a)]
Which Months: All Year Statistical Basis: None specified
- 267 [40 CFR 63.165(b)(1)] Pressure relief devices in gas/vapor service: After each pressure release, return to a condition indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.165(b)(1)]
- 268 [40 CFR 63.165(b)(2)] Pressure relief devices in gas/vapor service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 within 5 days (calendar) after the pressure release and being returned to organic HAP service, to confirm the condition indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in 40 CFR 63.180(c). Subpart H. [40 CFR 63.165(b)(2)]
Which Months: All Year Statistical Basis: None specified
- 269 [40 CFR 63.165(d)(2)] Pressure relief devices in gas/vapor service (rupture disk): After each pressure release, install a new rupture disk upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.165(d)(2)]
- 270 [40 CFR 63.166] Sampling connection systems: Equip with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 CFR 63.162(b). Operate the system as specified in 40 CFR 63.166(b). Subpart H.
- 271 [40 CFR 63.167] Open-ended valves or lines: Equip with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR 63.162(b) and 40 CFR 63.167(d) and (e). Ensure that the cap, blind flange, plug or second valve seals the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance or repair. Operate each open-ended valve or line equipped with a second valve in a manner such that the valve on the process fluid end is closed before the second valve is closed. Subpart H.
- 272 [40 CFR 63.168(c)] Valves in gas/vapor service or light liquid service (Phase I): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 10,000 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Subpart H. [40 CFR 63.168(c)]
Which Months: All Year Statistical Basis: None specified
- 273 [40 CFR 63.168(c)] Valves in gas/vapor service or light liquid service (Phase II): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Subpart H. [40 CFR 63.168(c)]
Which Months: All Year Statistical Basis: None specified
- 274 [40 CFR 63.168(d)(1)] Valves in gas/vapor service or light liquid service (Phase III, 2 percent or greater leaking valves): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 monthly, as specified in 40 CFR 63.180(b); or implement a quality improvement program for valves that complies with the requirements of 40 CFR 63.175 and monitor quarterly. If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). If electing to implement a quality improvement program, follow the procedures in 40 CFR 63.175. Subpart H. [40 CFR 63.168(d)(1)]
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

FUG 0001 - Equipment Fugitive Emissions

- 275 [40 CFR 63.168(d)(2)] Valves in gas/vapor service or light liquid service (Phase III, less than 2 percent leaking valves): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Permittee may elect to comply with the alternate standards in 40 CFR 63.168(d)(3) and (d)(4). Subpart H. [40 CFR 63.168(d)(2)]
Which Months: All Year Statistical Basis: None specified
- 276 [40 CFR 63.168(e)(1)] Valves in gas/vapor service or light liquid service: Determine percent leaking valves using the equation in 40 CFR 63.168(e)(1). Subpart H. [40 CFR 63.168(e)(1)]
- 277 [40 CFR 63.168(f)(3)] Valves in gas/vapor service or light liquid service (after leak repair): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once within three months (at least) after repair to determine whether the valve has resumed leaking. Subpart H. [40 CFR 63.168(f)(3)]
Which Months: All Year Statistical Basis: None specified
- 278 [40 CFR 63.168(f)] Valves in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after a leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.168(f)]
- 279 [40 CFR 63.168(h)(1)] Valves in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.168(b) through (d). Subpart H. [40 CFR 63.168(h)(1)]
- 280 [40 CFR 63.168(h)(2)] Valves in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the valves as frequently as practicable during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable. Subpart H. [40 CFR 63.168(h)(2)]
Which Months: All Year Statistical Basis: None specified
- 281 [40 CFR 63.168(i)(1)] Valves in gas/vapor service or light liquid service (difficult-to-monitor): Demonstrate that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface or it is not accessible at anytime in a safe manner. Subpart H. [40 CFR 63.168(i)(1)]
- 282 [40 CFR 63.168(i)(3)] Valves in gas/vapor service or light liquid service (difficult-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Maintain a written plan that requires monitoring of the valves at least once per calendar year. Subpart H. [40 CFR 63.168(i)(3)]
Which Months: All Year Statistical Basis: None specified
- 283 [40 CFR 63.169(a)] Pumps, valves, connectors, and agitators in heavy liquid service; instrumentation systems; and pressure relief devices in liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 within 5 days (calendar) if evidence of a potential leak to the atmosphere is found by visible, audible, olfactory, or any other detection method. If a reading of 10,000 ppm for agitators, 5,000 ppm for pumps handling polymerizing monomers, 2,000 ppm for all other pumps (including pumps in food/medical service), or 500 ppm for valves, connectors, instrumentation systems, and pressure relief devices, or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.169(c). Subpart H. [40 CFR 63.169(a)]
Which Months: All Year Statistical Basis: None specified
- 284 [40 CFR 63.169(c)] Pumps, valves, connectors, and agitators in heavy liquid service; instrumentation systems; and pressure relief devices in liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.169(c)]

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

FUG 0001 - Equipment Fugitive Emissions

- 285 [40 CFR 63.170] Surge control vessels and bottoms receivers: Equip with a closed-vent system that routes the organic vapors vented from the surge control vessel or bottoms receiver back to the process or to a control device that complies with the requirements of 40 CFR 63.172, except as provided in 40 CFR 63.162(b), or comply with the requirements of 40 CFR 63.119(b) or (c), if surge control vessel or bottoms receiver is not routed back to the process and meets the conditions specified in 40 CFR 63 Subpart H Table 2 or Table 3. Subpart H.
- 286 [40 CFR 63.172(d)] Comply with the requirements of 40 CFR 63.11(b). Subpart H. [40 CFR 63.172(d)]
- 287 [40 CFR 63.172(e)] Monitor control devices to ensure that they are operated and maintained in conformance with their design. Subpart H. [40 CFR 63.172(e)]
- 288 [40 CFR 63.172(f)(1)(i)] Closed-vent system (hard-piping): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.180(b). If an instrument reading greater than 500 ppm above background is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(1)(i)]
- 289 [40 CFR 63.172(f)(1)(ii)] Which Months: All Year Statistical Basis: None specified
- 290 [40 CFR 63.172(f)(2)(i)] Closed-vent system (hard-piping): Presence of a leak monitored by visual inspection/determination annually, as well as audible, or olfactory inspections. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(1)(ii)]
- 291 [40 CFR 63.172(f)(2)(ii)] Which Months: All Year Statistical Basis: None specified
- 292 [40 CFR 63.172(h)] Closed-vent system (duct work): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.180(b). If an instrument reading greater than 500 ppm above background is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(2)(i)]
- 293 [40 CFR 63.172(j)(1)] Which Months: All Year Statistical Basis: None specified
- 294 [40 CFR 63.172(j)(1)] Closed-vent system (duct work): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually according to the procedures in 40 CFR 63.180(b). If an instrument reading greater than 500 ppm above background is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(2)(ii)]
- 295 [40 CFR 63.172(j)(2)] Which Months: All Year Statistical Basis: None specified
- 296 [40 CFR 63.172(j)(2)] Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.172(i). Subpart H. [40 CFR 63.172(h)]
- 297 [40 CFR 63.172(k)(1)] Closed-vent system (bypass lines): Flow monitored by flow indicator once every 15 minutes. Install flow indicator at the entrance to any bypass line. Subpart H. [40 CFR 63.172(j)(1)]
- 298 [40 CFR 63.172(j)(1)] Which Months: All Year Statistical Basis: None specified
- 299 [40 CFR 63.172(j)(1)] Closed-vent system (bypass lines): Flow recordkeeping by electronic or hard copy once every 15 minutes. Generate records as specified in 40 CFR 63.118(a)(3). Subpart H. [40 CFR 63.172(j)(1)]
- 300 [40 CFR 63.172(j)(2)] Closed-vent system (bypass lines): Seal or closure mechanism monitored by visual inspection/determination monthly to ensure the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass line. Subpart H. [40 CFR 63.172(j)(2)]
- 301 [40 CFR 63.172(j)(2)] Which Months: All Year Statistical Basis: None specified
- 302 [40 CFR 63.172(j)(2)] Closed-vent system (bypass lines): Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. Subpart H. [40 CFR 63.172(j)(2)]
- 303 [40 CFR 63.172(k)(1)] Closed-vent system (unsafe-to-inspect): Demonstrate that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential dangers as a consequence of complying with 40 CFR 63.172(f)(1) or (f)(2). Subpart H. [40 CFR 63.172(k)(1)]

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

FUG 0001 - Equipment Fugitive Emissions

- 298 [40 CFR 63.172(k)(2)] Closed-vent system (unsafe-to-inspect): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment as frequently as practicable during safe-to-inspect times, but not more frequently than annually. Subpart H. [40 CFR 63.172(k)(2)]
Which Months: All Year Statistical Basis: None specified
- 299 [40 CFR 63.172(l)(1)] Closed-vent system (difficult-to-inspect): Demonstrate that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters above a support surface. Subpart H. [40 CFR 63.172(l)(1)]
- 300 [40 CFR 63.172(l)(2)] Closed-vent system (difficult-to-inspect): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once every five years. Maintain a written plan that requires inspection of the equipment at least once every five years. Subpart H. [40 CFR 63.172(l)(2)]
Which Months: All Year Statistical Basis: None specified
- 301 [40 CFR 63.172(m)] Ensure that the closed-vent system or control device is operating whenever organic HAP emissions are vented to the closed-vent system or control device. Subpart H. [40 CFR 63.172(m)]
- 302 [40 CFR 63.173(a)] Agitators in gas/vapor service or light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 monthly to detect leaks, as specified in 40 CFR 63.180(b). If an instrument reading of 10,000 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.173(c). Subpart H. [40 CFR 63.173(a)]
Which Months: All Year Statistical Basis: None specified
- 303 [40 CFR 63.173(b)] Agitators in gas/vapor service or light liquid service: Presence of a leak monitored by visual inspection/determination weekly (calendar) for indications of liquids dripping from the agitator. If there are indications of liquids dripping from the agitator, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.173(c). Subpart H. [40 CFR 63.173(b)]
Which Months: All Year Statistical Basis: None specified
- 304 [40 CFR 63.173(c)] Agitators in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.173(c)]
- 305 [40 CFR 63.173(d)(1)] Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater than the agitator stuffing box pressure; or equip with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of 40 CFR 63.172; or equip with a closed-loop system that purges the barrier fluid into a process stream. Subpart H. [40 CFR 63.173(d)(1)]
- 306 [40 CFR 63.173(d)(2)] Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Ensure that the barrier fluid is not in light liquid organic HAP service. Subpart H. [40 CFR 63.173(d)(2)]
- 307 [40 CFR 63.173(d)(3)] Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Equip barrier fluid system with a sensor that will detect failure of the seal system, barrier fluid system, or both. Subpart H. [40 CFR 63.173(d)(3)]
- 308 [40 CFR 63.173(d)(4)] Agitators in gas/vapor service or light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the agitator seal. If there are indications of liquid dripping from the agitator seal at the time of the weekly inspection, monitor the agitator as specified in 40 CFR 63.180(b) to determine the presence of organic HAP in the barrier fluid. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate the repair provisions in 40 CFR 63.173(d)(6). Subpart H. [40 CFR 63.173(d)(4)]
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

FUG 0001 - Equipment Fugitive Emissions

- 309 [40 CFR 63.173(d)(6)(i)] Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Determine, based on design considerations and operating experience, criteria that indicates failure of the seal system, the barrier fluid system, or both. Subpart H. [40 CFR 63.173(d)(6)(i)]
- 310 [40 CFR 63.173(d)(6)] Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.173(d)(6)]
- 311 [40 CFR 63.173(d)] Agitators in gas/vapor service or light liquid service (dual mechanical seal system - sensor): Equipment/operational data monitored by visual inspection/determination daily, or equip with an audible alarm unless the agitator is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criteria established in 40 CFR 63.173(d)(6), a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.173(d)(6). Subpart H. [40 CFR 63.173(d)]
Which Months: All Year Statistical Basis: None specified
- 312 [40 CFR 63.173(h)(1)] Agitators in gas/vapor service or light liquid service (difficult to monitor): Demonstrate that the agitator cannot be monitored without elevating the monitoring personnel more than two meters above a support surface or it is not accessible at anytime in a safe manner. Subpart H. [40 CFR 63.173(h)(1)]
- 313 [40 CFR 63.173(h)(3)] Agitators in gas/vapor service or light liquid service (difficult-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Maintain a written plan that requires monitoring of the agitator at least once per calendar year. Subpart H. [40 CFR 63.173(h)(3)]
Which Months: All Year Statistical Basis: None specified
- 314 [40 CFR 63.173(j)(1)] Agitators in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the agitator is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.173(a) through (d). Subpart H. [40 CFR 63.173(j)(1)]
- 315 [40 CFR 63.173(j)(2)] Agitators in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the agitator as frequently as practicable during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable. Subpart H. [40 CFR 63.173(j)(2)]
Which Months: All Year Statistical Basis: None specified
- 316 [40 CFR 63.174(b)(1)] Connectors in gas/vapor service or light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once within 12 months after the compliance date, except as provided in 40 CFR 63.174(f) through (h). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.174(d). Subpart H. [40 CFR 63.174(b)(1)]
Which Months: All Year Statistical Basis: None specified
- 317 [40 CFR 63.174(b)(3)(i)] Connectors in gas/vapor service or light liquid service (0.5% or greater leaking): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Subpart H. [40 CFR 63.174(b)(3)(i)]
Which Months: All Year Statistical Basis: None specified
- 318 [40 CFR 63.174(b)(3)(ii)] Connectors in gas/vapor service or light liquid service (less than 0.5% leaking): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once every two years. Subpart H. [40 CFR 63.174(b)(3)(ii)]
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

FUG 0001 - Equipment Fugitive Emissions

- 319 [40 CFR 63.174(c)(1)(i)] Connectors in gas/vapor service or light liquid service (opened or otherwise had the seal broken): Presence of a leak monitored by 40 CFR 60, Appendix A, Method 21 within three months after being returned to organic HAP service or when it is reconnected. If monitoring detects a leak, repair according to the provisions of 40 CFR 63.174(d), as specified, except as provided in 40 CFR 63.174(c)(1)(ii). Subpart H. [40 CFR 63.174(c)(1)(i)]
Which Months: All Year Statistical Basis: None specified
- 320 [40 CFR 63.174(c)(2)(i)] Connectors in gas/vapor service or light liquid service (2 inches or less in nominal diameter): Comply with the requirements of 40 CFR 63.169. Subpart H. [40 CFR 63.174(c)(2)(i)]
- 321 [40 CFR 63.174(c)(2)(ii)] Connectors in gas/vapor service or light liquid service (2 inches or less in nominal diameter): Organic HAP monitored by technically sound method within three months after being returned to organic HAP service after having been opened or otherwise had the seal broken. If monitoring detects a leak, implement repair provisions in 40 CFR 63.174(d). Subpart H. [40 CFR 63.174(c)(2)(ii)]
Which Months: All Year Statistical Basis: None specified
- 322 [40 CFR 63.174(d)] Connectors in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.171 and 63.174(g). Subpart H. [40 CFR 63.174(d)]
- 323 [40 CFR 63.174(f)(1)] Connectors in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the connector is unsafe to monitor because personnel would be exposed to an immediate danger as a result of complying with 40 CFR 63.174(a) through (c). Subpart H. [40 CFR 63.174(f)(1)]
- 324 [40 CFR 63.174(f)(2)] Connectors in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of connectors as frequently as practicable during safe to monitor times, but not more frequently than the periodic schedule otherwise applicable. Subpart H. [40 CFR 63.174(f)(2)]
Which Months: All Year Statistical Basis: None specified
- 325 [40 CFR 63.174(g)] Connectors in gas/vapor service or light liquid service (unsafe-to-repair): Demonstrate that repair personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.174(d). Subpart H. [40 CFR 63.174(g)]
- 326 [40 CFR 63.174(h)(2)] Connectors in gas/vapor service or light liquid service (inaccessible, ceramic, or ceramic-lined): Make a first attempt at repair within 5 days after leak is detected by visual, audible, olfactory or other means, and complete repairs no later than 15 calendar days after leak is detected, except as provided in 40 CFR 63.171 and 63.174(g). Subpart H. [40 CFR 63.174(h)(2)]
- 327 [40 CFR 63.174(i)] Connectors in gas/vapor service or light liquid service: Calculate percent leaking connectors as specified in 40 CFR 63.174(i)(1) and (i)(2). Subpart H. [40 CFR 63.174(i)]
- 328 [40 CFR 63.180] Comply with the test methods and procedures requirements provided in 40 CFR 63.180. Subpart H.
- 329 [40 CFR 63.181] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 63.181(a) through (k). Subpart H.
- 330 [40 CFR 63.182(b)] Submit Initial Notification: Due within 120 days after the date of promulgation of the subpart that references 40 CFR 63 Subpart H. Include the information specified in 40 CFR 63.182(b)(1). Subpart H. [40 CFR 63.182(b)]
- 331 [40 CFR 63.182(c)] Submit Notification of Compliance Status: Due within 90 days of the compliance dates specified in the 40 CFR 63 subpart that references 40 CFR 63 Subpart H. Include the information specified in 40 CFR 63.182(c)(1) through (c)(3). Subpart H. [40 CFR 63.182(c)]
- 332 [40 CFR 63.182(d)] Submit Periodic Reports: Due semiannually starting 6 months after the Notification of Compliance Status, as required in 40 CFR 63.182(c). Include the information specified in 40 CFR 63.182(d)(2) through (d)(4). Subpart H. [40 CFR 63.182(d)]

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

FUG 0001 - Equipment Fugitive Emissions

- 333 [LAC 33:III.2111] Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment.
- 334 [LAC 33:III.2199.B] Comply with 40 CFR 60 Subpart VV; 40 CFR 61 Subpart J; 40 CFR 63 Subparts YY, EEEE and FFFF; and LAC 33:III.2121 by implementing the Louisiana Consolidated Fugitive Emission Program Guidelines. Compliance is achieved through compliance with 40 CFR 63 Subpart H.
- 335 [LAC 33:III.2199.B] **STREAMLINED FUGITIVES PROGRAM**
Permittee shall comply with a streamlined equipment leaks monitoring program. Compliance with the streamlined program in accordance with this specific condition shall serve to comply with each of the fugitive emission monitoring programs being streamlined, as indicated in Table 1. Noncompliance with the streamlined program in accordance with this specific condition may subject the permittee to enforcement action for one of the applicable fugitive emissions programs.
- a. Streamlined program shall be applicable to the combined universe of components subject to any of the programs being streamlined. Any component type which does not require periodic monitoring under the overall most stringent program shall be monitored as required by the most stringent requirements of any other program being streamlined and will not be exempted. The streamlined program will include any exemptions based on size or component available in any of the programs being streamlined.
- b. Leak definitions and monitoring frequency shall be used based on the overall most stringent program. Percent leaker performance shall be calculated using the provisions of the overall most stringent program. Annual monitoring shall be defined as once every four quarters. Some allowance may be made in the first year on the streamlined program in order to allow for transition from existing monitoring schedules.
- c. Permittee shall comply with recordkeeping and reporting requirements of the overall most stringent program. Semiannual reports shall be submitted on September 30 and March 31 to cover the periods from January 1 through June 30 and July 1 through December 31, respectively. The semiannual reports shall include any monitoring performed within the reporting period.
- 336 [LAC 33:III.2199.B] **STREAMLINED FUGITIVES PROGRAM**

Unit or Plant Site	Programs Streamlined	Stream Applicability	Overall Most Stringent Program
M&TO	40 CFR 63 Subpart H	5% OHAP	40 CFR 60 Subpart H
	40 CFR 61 Subpart J	10% Benzene	
	(Referencing Subpart V)		
	40 CFR 60 Subpart VV	10% VOC	
	40 CFR 63 Subpart EEEE	5% OHAP	
	40 CFR 63 Subpart FFFF	5% OHAP	
	(Referencing Subpart UU)		
	LAC 33:III.2121	10% VOC.	

GRP 0001 3400 - Transfer Operations Cap

Group Members: EQT 0043 EQT 0044 EQT 0045 EQT 0046 EQT 0061

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

GRP 0001 3400 - Transfer Operations Cap

- 337 [LAC 33:III.501.C.6] Throughput $\leq$ 631.9223 MM gallons/yr. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if throughput exceeds the maximum listed in this specific condition for any twelve consecutive month period.
Which Months: All Year Statistical Basis: Twelve-consecutive-month maximum
- 338 [LAC 33:III.507.H.1.a] Submit report: Due annually, by the 31st of March. Report the throughput loaded for the preceding calendar year and the corresponding calculated emissions to the Office of Environmental Compliance, Enforcement Division.
- 339 [LAC 33:III.507.H.1.a] Throughput monitored by technically sound method during loading.
Which Months: All Year Statistical Basis: None specified
- 340 [LAC 33:III.507.H.1.a] Throughput recordkeeping by electronic or hard copy monthly.
Keep records of the total throughput loaded each month and the corresponding calculated emissions, as well as the total loaded for the last twelve months and the corresponding calculated emissions. Make records available for inspection by DEQ personnel.

GRP 0002 3428 - Quench Oil Tank Cap

Group Members: EQT 0012 EQT 0015

- 341 [LAC 33:III.501.C.6] Total Quench Oil Throughput $\leq$ 21.90 MM gallons/yr. Notify the Office of Environmental Compliance, Enforcement Division if throughput exceeds the maximum listed in this specific condition for any twelve consecutive month period.
Which Months: All Year Statistical Basis: Twelve-consecutive-month maximum
- 342 [LAC 33:III.507.H.1.a] Throughput monitored by technically sound method continuously.
Which Months: All Year Statistical Basis: None specified
- 343 [LAC 33:III.507.H.1.a] Throughput recordkeeping by electronic or hard copy monthly.
Keep records of the throughput each month and the corresponding calculated emissions as well as the throughput for the last twelve months and the corresponding calculated emissions. Make records available for inspection by DEQ personnel.

GRP 0003 3429 - Tank Emission Cap

Group Members: EQT 0002 EQT 0010 EQT 0011 EQT 0052

- 344 [LAC 33:III.507.H.1.a] To avoid PSD review for the Project 2021, VOC emissions from the tanks under this tank emission cap (Tanks 1200, 1116, 1117, and 2231) are limited to 23.66 tons per year. Permittee shall demonstrate compliance with this emission limit by recording the chemicals stored and throughput in the tanks under this emission cap. The chemicals listed in Appendix A to this permit shall only be stored in the tanks under this emission cap. The throughput and chemicals stored shall be recorded each month. The total throughput for the last twelve months shall also be recorded. These records shall be kept on site and available for inspection by the Office of Environmental Compliance. Total VOC emissions from the tanks under this emission cap over the maximum given in this emission cap for any twelve consecutive month period shall be considered a violation of this permit and must be reported to the Office of Environmental Compliance. A report showing chemicals stored, throughput, and the VOC emissions calculated based on the throughput for the preceding calendar year shall be submitted to the Office of Environmental Compliance by April 30.

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

GRP 0004 3430 - Loading Emission Cap

Group Members: EQT 0043 EQT 0044 EQT 0045 EQT 0061

- 345 [LAC 33:III.507.H.1.a] To avoid PSD review for the Project 2021, VOC emissions under this loading emission cap are limited to 10.83 tons per year. Permittee shall demonstrate compliance with this emission limit by recording the loading throughput of the chemicals listed in Appendix A to this permit. The throughput and chemicals loaded shall be recorded each month. The total throughput for the last twelve months shall also be recorded. These records shall be kept on site and available for inspection by the Office of Environmental Compliance. Total VOC loading emissions over the maximum given in this emission cap for any twelve consecutive month period shall be considered a violation of this permit and must be reported to the Office of Environmental Compliance. A report showing chemicals loaded, throughput, and the VOC emissions calculated based on the throughput for the preceding calendar year shall be submitted to the Office of Environmental Compliance by April 30.

SCN 0001 - Group 2 Transfer Operations

Group Members: EQT 0043 EQT 0044 EQT 0045 EQT 0061

- 346 [40 CFR 63.126(c)] Equipment/operational data recordkeeping by electronic or hard copy continuously.
- 347 [LAC 33:III.501.C.6] For each Group 2 transfer rack, the owner or operator shall maintain records as required in 40 CFR 63.130 (f). Subpart G. [40 CFR 63.126(c)] This SCN group is for loading operations: MGE Rerun, Mono Still Tails, Glycol, Acrylic Acid, and Diethanolamine.

SCN 0002 - Acrylates (Non-TAP) Loading

Group Members: EQT 0043 EQT 0045 EQT 0061

- 348 [LAC 33:III.501.C.6] Emissions from Acrylates (Non TAPs) loading shall be controlled by a thermal combustion unit with a 98% control efficiency.

SCN 0003 - Ethyl Acrylate Loading

Group Members: EQT 0043 EQT 0045 EQT 0061

- 349 [40 CFR 63.2346(b)(1)] TOC or Organic HAP $\geq$ 98 % reduction by weight, or $\leq$ 20 ppmv (dry basis @ 3% O₂) by venting the emissions that occur during loading through a closed-vent system to any combination of control devices meeting the applicable requirements of 40 CFR 63 Subpart SS. Subpart EEEE
Emissions are routed to a thermal combustion unit. [40 CFR 63.2346(b)(1)]
Which Months: All Year Statistical Basis: None specified
- 350 [40 CFR 63.2346(d)(2)] Ensure that organic liquids are loaded only into transport vehicles that have a current certification in accordance with the U.S. Department of Transportation (DOT) pressure test requirements in 49 CFR 180 for cargo tanks or 49 CFR 173.31 for tank cars, when loading into transport vehicles without vapor collection equipment. Subpart EEEE. [40 CFR 63.2346(d)(2)]
- 351 [40 CFR 63.2362(b)(1)] For each transport vehicle that you own that is equipped with vapor collection equipment and that is loaded with organic liquids at a transfer rack that is subject to control based on the criteria specified in Table 2 to this subpart, items 7 through 10, you must perform the vapor tightness testing required in Table 5 to this subpart, item 2, on that transport vehicle at least once per year. [40 CFR 63.2362(b)(1)]

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

SCN 0003 - Ethyl Acrylate Loading

- 352 [40 CFR 63.2362(b)(2)] For transport vehicles that you own that do not have vapor collection equipment, you must maintain current certification in accordance with the U.S. DOT qualification and maintenance requirements in 49 CFR part 180, subparts E (cargo tanks) and F (tank cars). [40 CFR 63.2362(b)(2)]
- 353 [40 CFR 63.2378(a)] Equipment/operational data monitored by the regulation's specified method(s) quarterly during the loading of a transport vehicle or the filling of a container. Monitor each potential source of vapor leakage in the system using the methods and procedures described in the rule requirements selected for the work practice standard for equipment leak components as specified in 40 CFR 63 Subpart EEEE Table 4 Item 4. If a reading of 500 pmv is measured, a leak is detected. If a leak is detected, repair according to the repair requirements specified in the selected equipment leak standards. Subpart EEEE. [40 CFR 63.2378(a)]
- 354 [40 CFR 63.2378(c)] Which Months: All Year Statistical Basis: None specified
Except as specified in paragraph (e) of this section, periods of planned routine maintenance of a control device used to control storage tanks or transfer racks, during which the control device does not meet the emission limits in Table 2 to this subpart, must not exceed 240 hours per year. [40 CFR 63.2378(c)]
- 355 [40 CFR 63.2378(e)] beginning no later than the compliance dates specified in §63.2342(e), paragraphs (b) through (d) of this section no longer apply. Instead, you must be in compliance with each emission limitation, operating limit, and work practice standard specified in paragraph (a) of this section at all times, except during periods of nonoperation of the affected source (or specific portion thereof) resulting in cessation of the emissions to which this subpart applies and must comply with the requirements specified in paragraphs (e)(1) through (5) of this section, as applicable. Equipment subject to the work practice standards for equipment leak components in Table 4 to this subpart, item 4 are not subject to this paragraph (e). [40 CFR 63.2378(e)]
- 356 [40 CFR 63.2386(a)] You must submit each report in Subpart SS of this part, Table 11 to this subpart, Table 12 to this subpart, and in paragraphs (c) through (j) of this section that applies to you. You must also comply with the requirements specified in §63.2346(l). [40 CFR 63.2386(a)]
- 357 [40 CFR 63.2390] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.2390(b) through (h), as applicable. Subpart EEEE.
- 358 [40 CFR 63.2394] Keep records in a form suitable and readily available for expeditious inspection and review according to 40 CFR 63.10(b), including records stored in electronic form at a separate location. Keep files of all information (including all reports and notifications) for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b). The remaining 3 years may be kept off site. Subpart EEEE.
- 359 [LAC 33:III.501.C.6] This SCN group is for loading operations: Ethyl Acrylate.
Emissions from Ethyl Acrylate loading operations are routed to the Acrylate Thermal Treatment Units (3414/EQT0231 and 3427/EQT1170).

SCN 0004 - Dripolene Dock Loading

Group Members: EQT 0046

- 360 [40 CFR 61.300(b)] Comply with the recordkeeping and reporting requirements in 40 CFR 61.305(i). [40 CFR 61.300(b)]
- 361 [40 CFR 63.1103(e)(3)] Organic HAP $\geq$ 98 % reduction by weight, or organic HAP or TOC $\leq$ 20 ppmv, whichever is less stringent, by venting emissions through a closed-vent system to any combination of control devices as specified in 40 CFR 63.1105. Subpart YY. [40 CFR 63.1103(e)(3)]
- Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

SCN 0004 - Dripolene Dock Loading

- 362 [40 CFR 63.560(a)(3)] Comply with the recordkeeping requirements of 40 CFR 63.567(j)(4) and the emission estimation requirements of 40 CFR 63.565(l). Subpart Y. [40 CFR 63.560(a)(3)]
- 363 [40 CFR 63.560(a)(4)] Meet the submerged fill standards of 46 CFR 153.282. Subpart Y. [40 CFR 63.560(a)(4)]
- 364 [LAC 33:III.2108.C.1] Equip with a vapor collection system designed to collect the organic compounds vapors displaced from ships and/or barges during loading.
- 365 [LAC 33:III.2108.C.2] VOC, Total ≥ 90 % reduction by weight by collecting and processing the vapors with a recovery and/or destruction system.
Which Months: All Year Statistical Basis: None specified
- 366 [LAC 33:III.2108.C.3.b] Barge loading of crude oil or other VOCs: Total Organic Compounds (TOC) ≤ 30 mg/l of VOC loaded (0.25 lb/1000 gal).
Which Months: All Year Statistical Basis: None specified
- 367 [LAC 33:III.2108.C.3.d] Ship loading of crude oil or other VOCs: Total Organic Compounds (TOC) ≤ 12 mg/l of VOC loaded (0.1 lb/1000 gal).
Which Months: All Year Statistical Basis: None specified
- 368 [LAC 33:III.2108.C.5] Load only into ships and/or barges equipped with vapor collection equipment that is compatible with the affected facility's vapor collection system.
- 369 [LAC 33:III.2108.C.6] Properly connect the vapor collection and disposal system to the ships and/or barges before any loading is done.
- 370 [LAC 33:III.2108.E.6] Submit notification: Due to the Office of Environmental Services at least 30 days prior to performing any emission test.
- 371 [LAC 33:III.2108.E] Determine compliance with LAC 33:III.2108.C.3 using the methods in LAC 33:III.2108.E.1 through E.5, as appropriate.
- 372 [LAC 33:III.2108.F.1] Submit test results: Due to the Office of Environmental Services within 60 days of any testing done in accordance with LAC 33:III.2108.E.
- 373 [LAC 33:III.2108.F.2] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2108.F.2.a through 2.e, as applicable.
- 374 [LAC 33:III.2108.G.1] Do not load gasoline, crude oil or other VOCs into ships or barges unless all loading and vapor lines, arms and hoses are equipped with fittings which make vapor-tight connections and provide tight shut-off when disconnected.
- 375 [LAC 33:III.2108.G.2] Prevent spills or leaks during attachment or disconnection of filling lines, hoses or arms. Do not spill liquids or handle in any other manner that would result in evaporation to the atmosphere.
- 376 [LAC 33:III.2108.G.3] Maintain all equipment associated with the loading of gasoline, crude oil or other VOCs into ships or barges to be leak-free, gas-tight and in good working order.
- 377 [LAC 33:III.501.C.6] This SCN group is for loading operations: Dripolene.
Emissions from Dripolene loading operations are routed to No. 1 Dock Thermal Treatment Unit (668/EQT0221).

SCN 0005 - Crude Butadiene/Propylene Dock Loading

Group Members: EQT 0046

- 378 [40 CFR 63.560(a)(3)] Comply with the recordkeeping requirements of 40 CFR 63.567(j)(4) and the emission estimation requirements of 40 CFR 63.565(l). Subpart Y. [40 CFR 63.560(a)(3)]
- 379 [40 CFR 63.560(a)(4)] Meet the submerged fill standards of 46 CFR 153.282. Subpart Y. [40 CFR 63.560(a)(4)]
- 380 [LAC 33:III.2108.C.1] Equip with a vapor collection system designed to collect the organic compounds vapors displaced from ships and/or barges during loading.
- 381 [LAC 33:III.2108.C.2] VOC, Total ≥ 90 % reduction by weight by collecting and processing the vapors with a recovery and/or destruction system.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

SCN 0005 - Crude Butadiene/Propylene Dock Loading

- 382 [LAC 33:III.2108.C.3.b] Barge loading of crude oil or other VOCs: Total Organic Compounds (TOC) $\leq$ 30 mg/l of VOC loaded (0.25 lb/1000 gal).
Which Months: All Year Statistical Basis: None specified
- 383 [LAC 33:III.2108.C.3.d] Ship loading of crude oil or other VOCs: Total Organic Compounds (TOC) $\leq$ 12 mg/l of VOC loaded (0.1 lb/1000 gal).
Which Months: All Year Statistical Basis: None specified
- 384 [LAC 33:III.2108.C.5] Load only into ships and/or barges equipped with vapor collection equipment that is compatible with the affected facility's vapor collection system.
- 385 [LAC 33:III.2108.C.6] Properly connect the vapor collection and disposal system to the ships and/or barges before any loading is done.
- 386 [LAC 33:III.2108.E.6] Submit notification: Due to the Office of Environmental Services at least 30 days prior to performing any emission test.
- 387 [LAC 33:III.2108.E] Determine compliance with LAC 33:III.2108.C.3 using the methods in LAC 33:III.2108.E.1 through E.5, as appropriate.
- 388 [LAC 33:III.2108.F.1] Submit test results: Due to the Office of Environmental Services within 60 days of any testing done in accordance with LAC 33:III.2108.E.
- 389 [LAC 33:III.2108.F.2] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2108.F.2.a through 2.e, as applicable.
- 390 [LAC 33:III.2108.G.1] Do not load gasoline, crude oil or other VOCs into ships or barges unless all loading and vapor lines, arms and hoses are equipped with fittings which make vapor-tight connections and provide tight shut-off when disconnected.
- 391 [LAC 33:III.2108.G.2] Prevent spills or leaks during attachment or disconnection of filling lines, hoses or arms. Do not spill liquids or handle in any other manner that would result in evaporation to the atmosphere.
- 392 [LAC 33:III.2108.G.3] Maintain all equipment associated with the loading of gasoline, crude oil or other VOCs into ships or barges to be leak-free, gas-tight and in good working order.
- 393 [LAC 33:III.501.C.6] This SCN group is for loading operations: Crude Butadiene and Propylene.
Emissions from Crude Butadiene and Propylene Loading operations are routed to process at UCC's Olefins Unit.

SCN 0006 - Amines Loading

Group Members: EQT 0043 EQT 0045 EQT 0061

- 394 [LAC 33:III.501.C.6] Emissions from Amines loading operations shall be routed to Overland Amines Scrubber (3407/EQT0225), No. 2 Dock Amines Scrubber (3409/EQT0227), and/or EDA Scrubber (3410/EQT0228).

UNF 0002 - Vopak Terminal St. Charles

- 395 [40 CFR 60.] All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.
- 396 [40 CFR 61.145(b)(1)] Provide DEQ with written notice of intention to demolish or renovate prior to performing activities to which 40 CFR 61 Subpart M applies.
Delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery is acceptable. [40 CFR 61.145(b)(1)]
- 397 [40 CFR 61.148] Do not install or reinstall on a facility component any insulating materials that contain commercial asbestos if the materials are either molded and friable or wet-applied and friable after drying. Subpart M.

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

UNF 0002 - Vopak Terminal St. Charles

- 398 [40 CFR 61.342(b)(2)] As part of the waiver application submitted under 40 CFR 61.342(b)(1), the owner or operator shall submit to the DEQ a plan under 40 CFR 61.10(b)(3) that is an enforceable commitment to obtain environmental benefits to mitigate the benzene emissions that result from extending the compliance date. The plan shall include the information specified in 40 CFR 61.342(b)(2)(i-iii). Subpart FF. [40 CFR 61.342(b)(2)]
- 399 [40 CFR 61.342(b)] Comply with the requirements of 40 CFR 61.342(c) through (h) no later than 90 days following the effective date, unless a waiver of compliance has been obtained under 40 CFR 61.11, or by the initial startup for a new source with an initial startup after the effective date. Subpart FF. [40 CFR 61.342(b)]
- 400 [40 CFR 61.342(c)(1)(i)] Waste streams containing benzene: Remove or destroy the benzene contained in the waste using a treatment process or wastewater treatment system that complies with the standards specified in 40 CFR 61.348. Subpart FF. [40 CFR 61.342(c)(1)(i)]
- 401 [40 CFR 61.342] Comply with the recordkeeping and reporting requirements of 40 CFR 61 Subpart FF. Controls are in place for wastewater streams with flow-weighted annual average benzene concentrations > 10 ppm. Subpart FF.
- 402 [40 CFR 61.355] Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.
- 403 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy continuously Maintain records as specified in 40 CFR 61.356(a) through (n). Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
- 404 [40 CFR 61.357(d)(2)] Submit report: Due annually, beginning on the date that equipment necessary to comply with 40 CFR 61 Subpart FF has been certified in accordance with 40 CFR 61.357(d)(1). Submit updates to the information listed in 40 CFR 61.357(a)(1) through (a)(3) or, if the information in 40 CFR 61.357(a)(1) through (3) is not changed in the following year, a statement to that effect. Subpart FF. [40 CFR 61.357(d)(2)]
- 405 [40 CFR 61.357(d)(6)] Submit report: Due quarterly, beginning three months after the date that the equipment necessary to comply with 40 CFR 61 Subpart FF has been certified in accordance with 40 CFR 61.357(d)(1). Submit a certification that all of the required inspections have been carried out in accordance with the requirements of 40 CFR 61 Subpart FF. Subpart FF. [40 CFR 61.357(d)(6)]
- 406 [40 CFR 61.357(d)(7)] Submit report: Due quarterly, beginning three months after the date that the equipment necessary to comply with 40 CFR 61 Subpart FF has been certified in accordance with 40 CFR 61.357(d)(1). Include the information specified in 40 CFR 61.357(d)(7)(i) through (d)(7)(v). Subpart FF. [40 CFR 61.357(d)(7)]
- 407 [40 CFR 61.357(d)(8)] Submit report: Due annually, beginning one year after the date that the equipment necessary to comply with 40 CFR 61 Subpart FF has been certified in accordance with 40 CFR 61.357(d)(1). Submit a report that summarizes all inspections required by 40 CFR 61.342 through 61.354 during which detectable emissions are measured or a problem that could result in benzene emissions is identified, including information about the repairs or corrective action taken. Subpart FF. [40 CFR 61.357(d)(8)]
- 408 [40 CFR 61.] All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart A.
- 409 [40 CFR 63.1-15] All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A .
- 410 [40 CFR 63.102(a)] Comply with the requirements of 40 CFR 63 Subparts G and H. Subpart F.
- 411 [40 CFR 63.103(b)(1)] This facility is not a SOCMH HON CMPI, but is a supporting facility to CMPIs. [40 CFR 63.102(a)]
Conduct performance tests and compliance determinations according to the schedule and procedures in 40 CFR 63.7(a) and the applicable sections of 40 CFR 63 Subparts G and H. Subpart F. [40 CFR 63.103(b)(1)]

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

UNF 0002 - Vopak Terminal St. Charles

- | | | |
|-----|------------------------|--|
| 412 | [40 CFR 63.103(b)(2)] | Submit Notification: Due at least 30 calendar days before a performance test is scheduled. Notify DEQ of the intention to conduct a performance test to allow DEQ the opportunity to have an observer present during the test. Subpart F. [40 CFR 63.103(b)(2)] |
| 413 | [40 CFR 63.103(b)(3)] | Conduct performance tests according to the provisions in 40 CFR 63.7(e) of subpart A, except conduct performance tests at maximum representative operating conditions for the process. Subpart F. [40 CFR 63.103(b)(3)] |
| 414 | [40 CFR 63.103(c)(1)] | Maintain all applicable records in such a manner that they can be readily accessed. Retain the most recent 6 months of records on site or make accessible by computer or other means that provides access within 2 hours after a request. Subpart F. [40 CFR 63.103(c)(1)] |
| 415 | [40 CFR 63.103(c)(2)] | Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain records specified in 40 CFR 63.103(c)(2)(i) through (iii), as well as records specified in 40 CFR 63 Subparts G and H. Subpart F. [40 CFR 63.103(c)(2)] |
| 416 | [40 CFR 63.103(c)] | Keep copies of all applicable reports and records required by 40 CFR 63 Subparts F, G, and H for at least 5 years. If 40 CFR 63 Subparts G or H require records to be maintained for a time period different than 5 years, maintain those records for the time specified in 40 CFR 63 Subparts G or H. Subpart F. [40 CFR 63.103(c)] |
| 417 | [40 CFR 63.105(d)] | Maintenance wastewater: Implement the procedures described in 40 CFR 63.105(b) and (c) as part of the start-up, shutdown and malfunction plan required under 40 CFR 63.6(e)(3). Subpart F. [40 CFR 63.105(d)] |
| 418 | [40 CFR 63.105(e)] | Maintenance wastewater: Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain a record of the information required by 40 CFR 63.105(b) and (c) as part of the start-up, shut-down, and malfunction plan required under 40 CFR 63.6(e)(3). Subpart F. [40 CFR 63.105(e)] |
| 419 | [40 CFR 63.105] | Maintenance wastewater: Prepare a description of maintenance procedures for the management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair and during periods which are not shutdowns as specified in 40 CFR 63.105(b)(1) through (b)(3). Modify and update the information required by 40 CFR 63.105(b) as needed following each maintenance procedure based on the actions taken and the wastewaters generated in the preceding maintenance procedure. Subpart F. |
| 420 | [40 CFR 63.1108(a)(1)] | Comply with the emission limitations and established parameter ranges at all times except during periods of startup, shutdown, malfunction, or non-operation of the affected source (or specific portion thereof) resulting in cessation of the emissions to which 40 CFR 63 Subpart YY applies. Subpart YY. [40 CFR 63.1108(a)(1)] |
| 421 | [40 CFR 63.1108(a)(1)] | Follow the applicable provisions of the startup, shutdown, malfunction plan required by 40 CFR 63.1111 during periods of startup, shutdown, or malfunction. However, if a startup, shutdown, malfunction or period of non-operation of one portion of an affected source does not affect the ability of a particular emission point to comply with the specific provisions to which it is subject, then that emission point shall still be required to comply with the applicable provisions of 40 CFR 63 Subpart YY and any of the subparts that are referenced by 40 CFR 63 Subpart YY during startup, shutdown, malfunction, or period of non-operation. Subpart YY. [40 CFR 63.1108(a)(1)] |
| 422 | [40 CFR 63.1108(a)(2)] | Comply with the equipment leak requirements at all times except during periods of startup, shutdown, malfunction, process unit shutdown, or non-operation of the affected source (or specific portion thereof) in which the lines are drained and depressurized resulting in cessation of the emissions to which equipment leak requirements apply. Subpart YY. [40 CFR 63.1108(a)(2)] |
| 423 | [40 CFR 63.1108(a)(5)] | Implement, to the extent reasonably available, measures to prevent or minimize excess emissions during startups, shutdowns, and malfunctions. Identify the measures to be taken in the startup, shutdown, and malfunction plan (if applicable). Subpart YY. [40 CFR 63.1108(a)(5)] |

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

UNF 0002 - Vopak Terminal St. Charles

- 424 [40 CFR 63.1108(a)(6)] Correct malfunctions as soon as practical after their occurrence and/or in accordance with the startup, shutdown, and malfunction plan developed as specified under 40 CFR 63.1111. Subpart YY. [40 CFR 63.1108(a)(6)]
- 425 [40 CFR 63.1109(a)] Keep copies of notifications, reports and records required by 40 CFR 63 Subpart YY and subparts referenced by 40 CFR 63 Subpart YY for at least 5 years, unless otherwise specified, except as provided in 40 CFR 63.1109(b). Subpart YY. [40 CFR 63.1109(a)]
- 426 [40 CFR 63.1109(c)] Maintain all records required to be maintained by 40 CFR 63 Subpart YY or a subpart referenced by 40 CFR 63 Subpart YY in such a manner that they can be readily accessed and are suitable for inspection. Retain the most recent 2 years of records onsite or make accessible to an inspector while onsite. The records of the remaining 3 years, where required, may be retained offsite. Subpart YY. [40 CFR 63.1109(c)]
- 427 [40 CFR 63.1109(d)] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records containing information developed and used to assess control applicability under 40 CFR 63.1103 (e.g., combined total annual emissions of regulated organic HAP). Subpart YY. [40 CFR 63.1109(d)]
- 428 [40 CFR 63.1110(a)] Each owner or operator of an affected source subject to this subpart shall submit the reports listed in paragraphs (a)(1) through (8) of this section, as applicable. Each owner or operator of an acrylic and modacrylic fiber production affected source or polycarbonate production affected source subject to this subpart shall also submit the reports listed in paragraph (a)(9) of this section in addition to the reports listed in paragraphs (a)(1) through (8) of this section, as applicable. Beginning no later than the compliance dates specified in §63.1102(c), each owner or operator of an ethylene production affected source subject to this subpart shall also submit the reports listed in paragraph (a)(10) of this section in addition to the reports listed in paragraphs (a)(1) through (8) of this section, as applicable. [40 CFR 63.1110(a)]
- 429 [40 CFR 63.1110(b)] Submit Notification of Initial Startup: Due within 15 days after initial startup. Send DEQ written notification of the actual date of initial startup. Include the information specified in 40 CFR 63.1110(f). Subpart YY. [40 CFR 63.1110(b)]
- 430 [40 CFR 63.1110(c)] Submit Initial Notification: Due within 1 year after the source becomes subject to 40 CFR 63 Subpart YY. Include the information specified in 40 CFR 63.1110(c)(2) through (c)(7), as applicable, and 63.1110(f). Subpart YY. [40 CFR 63.1110(c)]
- 431 [40 CFR 63.1110(d)] Submit Notification of Compliance Status: Due 240 days after the compliance date, or 60 days after completion of the initial performance test or initial compliance assessment, whichever is earlier. Include the information specified in 40 CFR 63.1110(d)(1)(i), (d)(1)(ii), and (f). Subpart YY. [40 CFR 63.1110(d)]
- 432 [40 CFR 63.1110(e)] Submit Periodic Reports: Due no later than 60 days after the end of each 6-month period. The first report shall cover the 6-month period after the Notification of Compliance Status report is due. Submit the first report no later than the last day of the month that includes the date 8 months (6 months and 60 days) after the Notification of Compliance Status report is due. Include all information specified in 40 CFR 63 Subpart YY and subparts referenced by 40 CFR 63 Subpart YY. Subpart YY. [40 CFR 63.1110(e)]
- 433 [40 CFR 63.1110(f)] All reports and notifications submitted pursuant to this subpart, including reports that combine information required under this subpart and a subpart referenced by this subpart, shall include the information specified in paragraphs (f)(1) through (4) of this section. [40 CFR 63.1110(f)]
- 434 [40 CFR 63.1111(a)(1)] Develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the affected source during periods of startup, shutdown, and malfunction. Include a program of corrective action for malfunctioning process and air pollution control equipment used to comply with relevant standards under 40 CFR 63 Subpart YY. Address in the plan routine or otherwise predictable CPMS malfunctions. Develop this plan by the compliance date. Subpart YY. [40 CFR 63.1111(a)(1)]

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

UNF 0002 - Vopak Terminal St. Charles

- 435 [40 CFR 63.1111(a)(2)] Operate and maintain the affected source (including associated air pollution control equipment and CPMS) in accordance with the procedures specified in the startup, shutdown, and malfunction plan developed under 40 CFR 63.1111(a)(1) during periods of startup, shutdown, and malfunction. Subpart YY. [40 CFR 63.1111(a)(2)]
- 436 [40 CFR 63.1111(a)(5)] Revise the startup, shutdown, and malfunction plan within 45 days after an event to include detailed procedures for operating and maintaining the affected source during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment or CPMS, if the startup, shutdown, and malfunction plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the startup, shutdown, and malfunction plan at the time the plan was developed. Subpart YY. [40 CFR 63.1111(a)(5)]
- 437 [40 CFR 63.1111(b)(1)] If actions during a startup, shutdown, and malfunction of an affected source, or of a control device or monitoring system required for compliance (including actions taken to correct a malfunction) are consistent with the procedures specified in the plan, state such information in a startup, shutdown, and malfunction report. Submit the startup, shutdown, and malfunction report by the 30th day following the end of each calendar half (or other calendar reporting period, as appropriate), unless the information is submitted with the Periodic Report. Include the information specified in 40 CFR 63.1111(b)(1)(i) through (b)(1)(iv). Subpart YY. [40 CFR 63.1111(b)(1)]
- 438 [40 CFR 63.1111(b)(2)] Any time an action taken during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) during which excess emissions occur is not consistent with the procedures specified in the affected source's plan, report the actions taken for that event within 2 working days after commencing actions inconsistent with the plan, followed by a letter delivered or postmarked within 7 working days after the end of the event. Include in the immediate report the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction plan, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred. Subpart YY. [40 CFR 63.1111(b)(2)]
- 439 [40 CFR 63.1111(c)] Comply with malfunction recordkeeping and reporting requirements specified in this paragraph (c). On and after July 6, 2023, the requirements of this paragraph (c) apply only to acrylic and modacrylic fiber production affected sources, ethylene production affected sources, and polycarbonate production affected sources. [40 CFR 63.1111(c)]
- 440 [40 CFR 63.112(a)] Control emissions of organic HAP's to the level represented by the equation listed in 40 CFR 63.112(a). Subpart G. [40 CFR 63.112(a)]
- 441 [40 CFR 63.112(c)] Demonstrate compliance with the emission standard in 40 CFR 63.112(a) by following the procedures specified in 40 CFR 63.112(e) for all emission points, or by following the emissions averaging compliance approach specified in 40 CFR 63.112(f) for some emission points and the procedures specified in 40 CFR 63.112(e) for all other emission points within the source. Subpart G. [40 CFR 63.112(c)]
- 442 [40 CFR 63.152(b)] Submit Notification of Compliance Status: Due within 150 calendar days after the compliance dates specified in 40 CFR 63.100. Include the information specified in 40 CFR 63.152(b)(1) through (b)(6), as applicable. Subpart G. [40 CFR 63.152(b)]
- 443 [40 CFR 63.152(c)] Submit Periodic Reports: Due semiannually no later than 60 calendar days after the end of each 6-month period, except as specified in 40 CFR 63.152(c)(5) and (c)(6). Submit the first report no later than 8 months after the date the Notification of Compliance Status is due. Include the information specified in 40 CFR 63.152(c)(2) through (c)(4). Subpart G. [40 CFR 63.152(c)]
- 444 [40 CFR 63.152(f)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records as specified in 40 CFR 63.152(f)(1) through (f)(7). Subpart G. [40 CFR 63.152(f)]
- 445 [40 CFR 63.2350(a)] Be in compliance with the emission limitations, operating limits, and work practice standards in 40 CFR 63 Subpart EEEE at all times when the equipment identified in 40 CFR 63.2338(b)(1) through (4) is in OLD operation. Subpart EEEE. [40 CFR 63.2350(a)]

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

UNF 0002 - Vopak Terminal St. Charles

- 446 [40 CFR 63.2350(b)] Always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in 40 CFR 63.6(e)(1)(i). Subpart EEEE. [40 CFR 63.2350(b)]
- 447 [40 CFR 63.2350(c)] Develop a written startup, shutdown, and malfunction (SSM) plan according to the provisions in 40 CFR 63.6(e)(3), except for emission sources not required to be controlled as specified in 40 CFR 63.2343. Subpart EEEE. [40 CFR 63.2350(c)]
- 448 [40 CFR 63.2350(d)] Beginning no later than the compliance dates specified in §63.2342(e), paragraph (b) of this section no longer applies. Instead, at all times, you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.2350(d)]
- 449 [40 CFR 63.2378(b)(1)] Comply with the emission limitations in 40 CFR 63 Subpart EEEE at all times except during periods of nonoperation resulting in cessation of the emissions. Subpart EEEE. [40 CFR 63.2378(b)(1)]
- 450 [40 CFR 63.2378(b)(2)] The owner or operator must not shut down control devices or monitoring systems that are required or utilized for achieving compliance with this subpart during periods of SSM while emissions are being routed to such items of equipment if the shutdown would contravene requirements of this subpart applicable to such items of equipment. This paragraph (b)(2) does not apply if the item of equipment is malfunctioning. This paragraph (b)(2) also does not apply if the owner or operator shuts down the compliance equipment (other than monitoring systems) to avoid damage due to a contemporaneous SSM of the affected source or portion thereof. If the owner or operator has reason to believe that monitoring equipment would be damaged due to a contemporaneous SSM of the affected source or portion thereof, the owner or operator must provide documentation supporting such a claim in the next Compliance report required in Table 11 to this subpart, item 1. Once approved by the Administrator, the provision for ceasing to collect, during a SSM, monitoring data that would otherwise be required by the provisions of this subpart must be incorporated into the SSM plan. [40 CFR 63.2378(b)(2)]
- 451 [40 CFR 63.2378(b)(3)] Implement during SSM, to the extent reasonably available, measures to prevent or minimize excess emissions. Identify the measures to be taken in the SSM plan. Subpart EEEE. [40 CFR 63.2378(b)(3)]
- 452 [40 CFR 63.2378(b)] Follow the requirements in 40 CFR 63.6(e)(1) and (3) during periods of startup, shutdown, malfunction, or nonoperation of any affected source or any part thereof. Subpart EEEE. [40 CFR 63.2378(b)]
- 453 [40 CFR 63.2382(c)] Submit Notification of Intent to conduct performance test: Due to DEQ at least 60 calendar days before performance test is initially scheduled to begin as required in 40 CFR 63.7(b)(1). Subpart EEEE. [40 CFR 63.2382(c)]
- 454 [40 CFR 63.2386(a)] Submit SSM report: Due to DEQ by letter within 7 working days after the end of a SSM that resulted in an applicable emission standard in the relevant standard being exceeded, and actions were taken that were not consistent with the SSM plan, unless alternative arrangements have been made with DEQ. Include the information specified in 40 CFR 63.10(d)(5)(ii). Subpart EEEE. [40 CFR 63.2386(a)]
- 455 [40 CFR 63.2386(a)] Submit compliance status report: Due semiannually, by the 30th of January and July, to DEQ in accordance with 40 CFR 63.2386(b). Include the information specified in 40 CFR 63 Subpart EEEE Table 11 Items 1.a through 1.d, as applicable. Subpart EEEE. [40 CFR 63.2386(a)]
- 456 [40 CFR 63.2515] Submit all applicable notifications as per 40 CFR 63.2515(a) through (c). Subpart FFFF.
- 457 [40 CFR 63.2520(a)] Submit each applicable report in Table 11 to this subpart. Subpart FFFF. [40 CFR 63.2520(a)]

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

UNF 0002 - Vopak Terminal St. Charles

- | | | |
|-----|-----------------------|--|
| 458 | [40 CFR 63.2525] | Keep records specified in paragraphs (a) through (t) of this subpart, as applicable. Subpart FFFF. |
| 459 | [40 CFR 63.2540] | Comply with all applicable parts of the General Provisions in 40 CFR 63 Subpart A as per Table 12 to this subpart. Subpart FFFF. |
| 460 | [40 CFR 63.7881(a)] | When permittee conducts a site remediation, as defined in 40 CFR 63.7957, permittee shall comply with all applicable requirements of this subpart unless the site remediation is exempted under 40 CFR 63.7881 (b) or (c). Subpart GGGGG. [40 CFR 63.7881(a)] |
| 461 | [40 CFR 68.10] | Comply with all applicable provisions from 40 CFR 68. |
| 462 | [40 CFR 82.Subpart F] | Comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B. |
| 463 | [LAC 33:III.1103] | Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited. |
| 464 | [LAC 33:III.1109.B] | Outdoor burning of waste material or other combustible material is prohibited. |
| 465 | [LAC 33:III.1303.B] | Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited. |
| 466 | [LAC 33:III.1305] | Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7. |
| 467 | [LAC 33:III.2113.A] | Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5. |
| 468 | [LAC 33:III.219] | Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance. |
| 469 | [LAC 33:III.2901.D] | Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited. |
| 470 | [LAC 33:III.2901.F] | If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G. |
| 471 | [LAC 33:III.501.C.6] | Temporary Diesel or Gasoline Equipment (internal combustion engines) shall be operated on the basis that they are not subject to the New Source Performance Standard, 40 CFR 60 Subpart IIII or JJJJ, and NESHAP, 40 CFR 63 Subpart ZZZZ. In accordance with 40 CFR 1068.31(e), a nonroad engine ceases to be a nonroad engine and becomes a stationary engine if it is used or will be used at this facility for 12 months or longer. |
| 472 | [LAC 33:III.509.R.6] | Before beginning actual construction of the Ethylene Oxide Project, permittee shall document and maintain a record of the following information: 1) a description of the project; 2) the emissions units whose emissions of a regulated pollutant could be affected by the project; and 3) a description of the applicability test used to determine that the project is not a major modification for any regulated pollutant, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded from the projected actual emissions (the demand growth exclusion) and an explanation for why such amount was excluded, and any netting calculations, if applicable. |
| 473 | [LAC 33:III.509.R.6] | Permittee shall monitor the VOC emissions from the project and calculate and maintain a record of the annual emissions, in TPY on a calendar year basis, for a period of 10 years following resumption of regular operations. |

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

UNF 0002 - Vopak Terminal St. Charles

- 474 [LAC 33:III.509.R.6] Permittee shall submit a report to LDEQ within 60 days after the end of the year if annual VOC emissions, in TPY, from the project in question exceed the baseline actual emissions by a "significant" (as defined in LAC 33:III.509.B) amount, and if such emissions differ from the preconstruction projection. This report shall contain the following: 1) the name, address, and telephone number of the major stationary source; 2) the annual emissions; and 3) any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).
- 475 [LAC 33:III.5105.A.2] Do not cause a violation of any ambient air standard listed in LAC 33:III.Table 51.2, unless operating in accordance with LAC 33:III.5109.B.
- 476 [LAC 33:III.5107.A.2] Include a certification statement with the annual emission report and revisions to any emission report that attests that the information contained in the emission report is true, accurate, and complete, and that is signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official.
- 477 [LAC 33:III.5107.A] Submit Annual Emissions Report: Due annually, by the 30th of April unless otherwise directed by DEQ, to the Office of Environmental Services in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.
- 478 [LAC 33:III.5107.B.1] Emergency Conditions. For any discharge of a toxic air pollutant into the atmosphere that results or threatens to result in an emergency condition as defined in LAC 33:I.3905.A, the owner or operator of the source shall notify the Department of Public Safety 24-hour Louisiana. Emergency Hazardous Materials Hotline in accordance with LAC 33:I.3915.A.
- 479 [LAC 33:III.5107.B.2] Nonemergency Conditions. Except as provided in Paragraph B.4 of this Section, for any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance Section 5107 Title 33, Part III April 2014 Environmental Regulatory Code 312 schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:I.3931, the owner or operator of the source shall immediately, but in no case later than 24 hours, provide prompt notification to SPOC in the manner provided in LAC 33:I.3923.
- 480 [LAC 33:III.5107.B.3] Written Reports. For every such discharge or equipment bypass as referred to in Paragraphs B.1 and 2 of this Section, the owner or operator shall submit to SPOC a written report by certified mail within seven calendar days of learning of the discharge.
- 481 [LAC 33:III.5109.B] Determine the status of compliance, beyond the property line, with applicable ambient air standards listed in LAC 33:III.5112.Table 51.2.
- 482 [LAC 33:III.5109.C] Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III.Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by DEQ.
- 483 [LAC 33:III.5151.F.1.f] An individual or company contracted to perform a demolition or renovation activity which disturbs RACM must be recognized by the Licensing Board for Contractors to perform asbestos abatement, and shall meet the requirements of LAC 33:III.5151.F.2 and F.3 for each demolition or renovation activity.
- 484 [LAC 33:III.535] Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and the Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC 33:III.537]
- 485 [LAC 33:III.5609.A.1.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611.Table 5 when the administrative authority declares an Air Pollution Alert.
- 486 [LAC 33:III.5609.A.2.b] Activate the preplanned strategy listed in LAC 33:III.5611.Table 6 when the administrative authority declares an Air Pollution Warning.

SPECIFIC REQUIREMENTS

AI ID: 227637 - Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St. Charles

Activity Number: PER20220001

Permit Number: 2520-00186-V1

Air - Title V Regular Permit Minor Mod

UNF 0002 - Vopak Terminal St. Charles

- 487 [LAC 33:III.5609.A.3.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611.Table 7 when the administrative authority declares an Air Pollution Emergency.
- 488 [LAC 33:III.5609.A] Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency. Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611.Tables 5, 6, and 7.
- 489 [LAC 33:III.5901.A] Comply with the provisions of 40 CFR 68 as incorporated in LAC 33:III.Chapter 59. Modifications or exceptions provided in LAC 33:III.5901.C shall not relieve the permittee from the obligation to comply timely with any otherwise applicable condition of 40 CFR 68.
- 490 [LAC 33:III.5907] Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur.
- 491 [LAC 33:III.5911.A] Submit registration: Due January 31, 1998, or within 60 days after the source becomes subject to LAC 33:III.Chapter 59, whichever is later. Include the information listed in LAC 33:III.5911.B, and submit to the Department of Environmental Quality, Office of Environmental Compliance, Inspection Division.
- 492 [LAC 33:III.5911.C] Submit amended registration: Due to the Department of Environmental Quality, Office of Environmental Compliance, Inspection Division within 60 days after the information in the submitted registration is no longer accurate.
- 493 [LAC 33:III.905] Install air pollution control facilities whenever practically, economically, and technologically feasible. When facilities have been installed on a property, use them and diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the facilities, even though the ambient air quality standards in affected areas are not exceeded.
- 494 [LAC 33:III.919] Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 30th of April for the period January 1 to December 31 of the previous year. Submit emission inventory data in the format specified by the Office of Environmental Services. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-F.
- 495 [LAC 33:III.927] Report the unauthorized discharge of any air pollutant into the atmosphere in accordance with LAC 33:I.Chapter 39, Notification Regulations and Procedures for Unauthorized Discharges. Submit written reports to the department pursuant to LAC 33:I.3925. Submit timely and appropriate follow-up reports detailing methods and procedures to be used to prevent similar atmospheric releases.

Vopak Industrial Infrastructure Americas St. Charles, LLC / Vopak Terminal St. Charles
Inspection Date 09/24/2024

Appendix 3

Title V Permit Renewal Application



JEFF LANDRY
GOVERNOR

AURELIA S. GIACOMETTO
SECRETARY

STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL SERVICES

January 18, 2024
Emailed

Agency Interest No. 227637
Permit No.: 2520-00186-V2
Activity No.: PER20240001

Kory Pourciau
Vopak Industrial Infrastructure Americas St. Charles LLC
335 LA Hwy 3142 Bldg 732
Hahnville, LA 70057

RE: Vopak Industrial Infrastructure Americas St Charles LLC - Vopak Terminal St.
Charles
Administrative Completeness Determination

Dear Mr. Pourciau:

The Office of Environmental Services received your application for a Title V permit modification and renewal on January 18, 2024. As of the date of this letter, the application, along with any additional information submitted to date, has been determined to be administratively complete and has been assigned to the Petrochemical Section. Please note that the Department may require additional information if technical deficiencies are found at a later date.

If you have any questions, please call me at (225) 219-3369. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey Budd".

Jeffrey Budd
Environmental Project Specialist
Permit Application Administrative Review Group

c: IO-A

MAIN FILE

PER20240001

original to IOA
98
copy to Petro/Prestenbach
PAAR

LDEQ
2024 JAN 18 PM 12:10

**TITLE V OPERATING PERMIT RENEWAL
AND MINOR MODIFICATION APPLICATION**
Vopak Terminal St. Charles / Permit No. 2520-00186-V1



Vopak Industrial Infrastructure Americas St. Charles, LLC
Hahnville, St. Charles Parish, Louisiana
AI No. 227637

TRINITY CONSULTANTS
1800 W Loop S, Ste 1000
Houston, Texas 77027

January 2024

Project 234402.0217



TABLE OF CONTENTS

1. PROJECT INFORMATION	1-1
1.1 Introduction	1-1
1.2 Project Description	1-1
1.3 Application Organization	1-3
2. ADMINISTRATIVE FORMS	2-1
3. LOCATION INFORMATION	3-1
4. PROCESS DESCRIPTION	4-1
5. EMISSION CALCULATIONS	5-1
5.1 General Condition XVII Sources	5-1
5.1.1 Hose Connect / Disconnect.....	5-1
5.1.2 Truck and Rail Car Sampling.....	5-1
5.1.3 Pump Replacement.....	5-1
5.1.4 In-Line Item Replacement	5-1
5.1.5 Storage Tank / Process Vessel Relief Device Replacement.....	5-1
5.1.6 Tank Cleaning	5-2
5.1.7 Acrylate TTU Maintenance	5-2
5.1.8 Tank Degassing	5-2
5.1.9 Process Sampling Activities.....	5-2
5.1.10 Filter Changes	5-2
5.1.11 Tank/Rail Car Cleaning/Venting.....	5-2
5.1.12 Hatch Sampling	5-2
5.1.13 Piggings Activities.....	5-3
5.2 Storage Tanks	5-3
5.3 EDA Scrubber	5-3
5.4 Loading	5-4
5.5 Acrylate Thermal Treatment Unit	5-5
5.6 No. 1 Dock Thermal Treatment Unit	5-5
5.7 Piping Equipment Fugitives	5-5
6. FEDERAL NEW SOURCE REVIEW	6-1
7. RULE APPLICABILITY ANALYSIS	7-1
7.1 Louisiana Air Pollution Control Regulations	7-1
7.2 Federal Air Pollution Control Regulations.....	7-1
APPENDIX A. EMISSION CALCULATIONS	A-1
APPENDIX B. EMISSION INVENTORY QUESTIONNAIRE (EIQ) FOR AIR POLLUTANTS	B-1
APPENDIX C. CERTIFICATE OF GOOD STANDING	C-1

On Wed, Jan 17, 2024 at 12:24 PM Ashley Broom <Ashley.Broom@la.gov> wrote:

Hey Kelly,

We did receive the payment. It did do the same as last time and did not generate a receipt correctly.

Confirmation Number	Payment Amount	Payment Date	AI
O25G1C8Z6R	8321.00	01/15/2024	227637

Thanks!

Ashley Broom

Louisiana Department of Environmental Quality

(225)-219-3907 phone

(225)-219-3868 fax

Ashley.Broom@la.gov

From: Kelly Phillips <kelly.phillips@vopak.com>

Sent: Monday, January 15, 2024 1:23 PM

To: Ashley Broom <Ashley.Broom@LA.GOV>

Cc: Jeffrey Budd <Jeffrey.Budd@LA.GOV>

Subject: Re: [EXTERNAL] Expedited Application - Vopak Terminal Plaquemine - AI 227184

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hi Ashley,

I just paid an application fee online, but I'm not sure it went through. I didn't want to redo it again and we seemed to have the same problem last time. Could you please look into it? It's for AI# 227637. Thank you!



error payment rejected The error returned if a payment cannot be processed as it violates business rules.(5267)

Fee Payment Checkout

Your Cart Contents:

Description	Base Fee	Quantity	Line Total
Fee Code 1380 - Minor Mod	\$8,321.00	1	\$8,321.00
Subtotal	\$8,321.00		

* Please note the method of payment (credit card or e-check) determines the bank fee.

* Please do not refresh the page or go back to the previous page during a transaction. It may cause the browser to initiate another payment request.

Kelly Phillips

LIST OF FIGURES

Figure 3-1. Overall Site Map

3-2

LIST OF TABLES

Table 1-1. Sitewide Emissions Summary	1-4
Table 1-2. Project Emissions Summary	1-5
Table 6-1. Retrospective Federal NSR Applicability Analysis	6-2

1. PROJECT INFORMATION

1.1 Introduction

Vopak Industrial Infrastructure Americas St. Charles, LLC (VIIA) owns and operates the Vopak Terminal St. Charles facility, a for-hire bulk terminal. Existing facilities are authorized by Permit No. 2520-00186-V1. The site is an existing major source of hazardous air pollutants (HAPs) and toxic air pollutants (TAPs).

1.2 Project Description

Permit No. 2520-00186-V1 will expire on July 19, 2024. The purpose of this application is to renew and modify Permit No. 2520-00186-V1. This application is being submitted prior to January 19, 2024, but not more than 18 months before the date of permit expiration pursuant to LAC 33:III.507.E.4.

The application includes the following proposed changes:

1. VIIA proposes to update the storage tank emission calculations based on the latest guidance in *Compilation of Air Pollutant Emission Factors: Volume I Stationary Point and Area Sources* (AP-42, Fifth Edition, US EPA, June 2020) Section 7.1.
2. Update the emission rates for the General Condition XVII Activities.
 - a. Correct calculation errors for activities 7 and 8.
 - b. Remove activity 10, as it is not relevant to current operations.
3. Update average temperature for loading operations based on storage temperatures calculated using the latest AP-42 methodology.
4. Correct loading calculation errors in prior submittals, including, in part:
 - a. Correction of the maximum hourly throughput of Methoxytriglycol and MGE Rerun in the No. 1 T/C Rack Rail Loading emissions, as well as correction of the vapor pressure for MGE Rerun (see Appendix Table A-20).
 - b. Correction of the vapor pressure for MPG Basic and MGE Rerun in the No. 3 T/C Rack Rail Loading emissions (see Appendix Table A-21).
 - c. Correction of the vapor pressure for MPG Basic in the No. 1 T/T Rack Truck Loading emissions (see Appendix Table A-24).
5. Update the annual loading throughput controlled by the Acrylate Thermal Treatment Unit (TTU) to match the tank throughput for the corresponding products.
6. Remove methyl methacrylate as a product handled at the site.
7. Correct Acrylate TTU and No. 1 Dock TTU combustion emission calculations to be based on AP-42 Section 4.1 emission factors converted to units of pounds per million standard cubic feet (lb/MMscf) to account for the combusted gas having a higher heating value not equal to the default value for natural gas.
8. VIIA proposes to make changes to the permit modification authorized March 15, 2022 (Activity No. PER20210004). Specifically, VIIA proposes to add ethanol and methanol to the list of authorized products in Appendix A to allow for flexibility in marketing the use of these tanks to potential customers. If ethanol or methanol is stored at the terminal, VIIA will retrofit Tank 1116 (EIQ 511) and/or Tank 1119 (EIQ 513) with an internal floating roof (IFR). In addition, loading of ethanol and methanol will be controlled by the Acrylate TTU. The Tank Emission Cap (EIQ 3429) and Loading Emission Cap (EIQ 3430) will remain unchanged due to the proposed new products to be added to Appendix A. VIIA is requesting two new Common Requirement Groups (CRGs) to represent the applicable rule requirements for each storage tank scenario. In this application, proposed CRG 0006 represents the requirements if Tanks 1116 and 1119 remain equipped with fixed roofs, and proposed CRG 0007 represents the

requirements if the tanks are retrofit with IFRs. Each tank will be assigned to both CRGs. If the tanks store methanol or ethanol, they will become subject to LAC 33:III.2103, Title 40 Code of Federal Regulations (40 CFR) 60 Subpart Kb, and 40 CFR 63 Subpart EEEE. Note, fixed roof tanks will store only products with vapor pressures below 0.75 psia. VIIA is also requesting two new loading scenarios that are applicable during ethanol and methanol loading. Scenario 8 (SCN 0008) is for truck and rail loading, and Scenario 9 (SCN 0009) is for marine loading of methanol and/or ethanol.

9. Remove applicability of 40 CFR 61 Subpart FF. The Vopak Terminal St. Charles site is not a chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery. Additionally, it is not a hazardous waste treatment, storage, or disposal facility that treats, stores, or disposes of hazardous waste generated by a chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery. Therefore, the provisions of Subpart FF are not applicable to the VIIA equipment and operations.
10. Remove applicability of 40 CFR 63 Subparts F, G, and H. The Vopak Terminal St. Charles site is not a chemical manufacturing process unit. It does not manufacture as a primary product any of the chemicals listed in table 1 of Subpart F, nor does it use as a reactant or manufacture as a product, or co-product, any organic hazardous air pollutants listed in table 2 of Subpart F. Therefore, the provisions of Subparts F, G, and H are not applicable to the VIIA equipment and operations. With the removal of these regulations, common requirement group CRG 0001 and SCN 001 are no longer valid or applicable.
11. Remove applicability of 40 CFR 63 Subpart YY. The Vopak Terminal St. Charles site does not belong to any of the source categories listed in Table 1 of Subpart YY. The terminal does not produce any of the products represented by the applicable source categories. Therefore, the provisions of Subpart YY are not applicable to the VIIA equipment and operations.
12. Remove applicability of 40 CFR 63 Subpart FFFF. The Vopak Terminal St. Charles site does not contain any miscellaneous organic chemical manufacturing process units or equipment necessary to operate a miscellaneous organic chemical manufacturing process. Therefore, the provisions of Subpart FFFF are not applicable to the VIIA equipment and operations.
13. Due to removal of applicability of 40 CFR 63 Subparts, G, YY, and FFFF, several sources will now be newly subject to 40 CFR 63 Subpart EEEE. These include the following:

Source ID No.	Descriptive Name of Source
EQT0001	607 - Tank 3101
EQT0010	511 - Tank 1116
EQT0011	513 - Tank 1119
EQT0012	514 - Tank 1310
EQT0014	516 - Tank 1321 (EFR)
EQT0015	517 - Tank 1330
EQT0016	518 - Tank 1331 (EFR)
EQT0025	536 - Tank 2220 (IFR)
EQT0037	600 - Tank 1301 (EFR)
EQT0038	601 - Tank 1311 (EFR)
EQT0039	602 - Tank 2102 (IFR)
EQT0041	606 - Tank 3100 (EFR)
EQT0042	608 - Tank 4101 (EFR)
EQT0048	633 - Tank 5101 (EFR)
EQT0049	634 - Tank 6200 (EFR)
EQT0054	668 - No. 1 Dock Thermal Treatment Unit
EQT0066	635 - Tank 6220
EQT0067	635A - Tank 6210
SCN004	Dripolene Dock Loading

Source ID No.	Descriptive Name of Source
SCN005	Crude Butadiene/Propylene Dock Loading
SCN008	Methanol and Ethanol Loading Truck and Rail Loading
SCN009	Methanol and Ethanol Dock Loading

14. Due to differing requirements in Subpart EEEE, CRG 0003 is proposed to be split into two groups. EQTs 0014, 0016, 0037, 0038, and 0049 will remain as CRG 0003. EQTs 0041, 0042, and 0048 are proposed to be part of a new group CRG 0008.
15. Remove applicability of 40 CFR 82 Subpart F. VIIA does not own or operate commercial refrigeration equipment normally containing more than 50 pounds of refrigerant at the Vopak Terminal St. Charles facility. Therefore, the provisions of Subpart F are not applicable to the VIIA equipment and operations.
16. Remove permit conditions 472, 473, and 474 which are associated with the "Ethylene Oxide Project" and the recordkeeping required to demonstrate that the project does not cause a significant increase in emissions. VIIA believes these permit conditions were relevant to the site when it was owned and operated by Union Carbide Corporation (AI No. 2083); however, VIIA does not handle or store ethylene oxide or have any knowledge of the "Ethylene Oxide Project" referred to in these conditions and therefore requests removal of these conditions.

1.3 Application Organization

This application is organized into the following sections:

Section 1 presents the application objectives and organization.

Section 2 contains the LDEQ administrative forms.

Section 3 contains a map showing the location of the terminal.

Section 4 contains a process description of the facilities associated with this application.

Section 5 contains a discussion of the estimated emissions from the facilities included in this application.

Section 6 addresses applicability of the federal Nonattainment New Source Review (NNSR) and Prevention of Significant Deterioration (PSD) permitting requirements.

Section 7 addresses the applicability of state and federal air regulations to the proposed renewal and modification.

Appendix A contains emission calculations.

Appendix B contains an Emissions Inventory Questionnaire (EIQ) for Air Pollutants form for the project source.

Appendix C Certificate of Good Standing.

Table 1-1. Sitewide Emissions Summary

Pollutant	Currently Permitted (tpy)	Project Increases (tpy)	Post-Project Total Emissions (tpy)
Criteria			
PM10	0.43	0.13	0.56
PM2.5	0.43	0.13	0.56
SO2	0.03	0.01	0.04
NOx	5.69	1.66	7.35
CO	4.77	1.41	6.18
VOC	276.21	4.36	280.57
TAPs			
1,2-Dichloroethane	0.003		0.003
1,3-Butadiene	10.985	-1.53	9.452
1,4-Dioxane	<0.01	<0.01	0.01
1-Methylnaphthalene	0.33		0.33
2,2,4-Trimethylpentane	0.15	0.01	0.16
Acetaldehyde	1.47	-0.02	1.45
Acrylic acid	0.21		0.21
Antimony (and compounds)	<0.01		<0.01
Barium (and compounds)	<0.01		<0.01
Benzene	10.39	0.84	11.23
Biphenyl	0.04		0.04
Cadmium (and compounds)	<0.01		<0.01
Cresol	0.19	0.01	0.20
Cumene	5.87		5.87
Diethanolamine	1.46		1.46
Ethyl Acrylate	0.61	0.46	1.07
Ethyl benzene	3.05	-0.01	3.04
Ethylene glycol	1.95	-0.20	1.75
Formaldehyde	0.11		0.11
Glycol ethers (Table 51.1)	0.01		0.01
Glycol ethers (Table 51.3)	7.39	-0.02	7.37
Hydrogen sulfide	0.41		0.41
Hydroquinone	<0.01		<0.01
Methanol	1.12	6.25	7.37
Methyl Cellosolve Acetate	<0.01		- ^a
Methyl ethyl ketone	0.01		0.01
Methyl isobutyl ketone	0.02		0.02
Methyl methacrylate	0.20	-0.20	0.00
Naphthalene	3.21	-0.01	3.20
n-butyl alcohol	7.23	0.41	7.64
n-Hexane	29.42	0.97	30.39
Phenol	0.23		0.23
Polynuclear Aromatic Hydrocarbons	0.077	-0.006	0.071
Quinoline	0.07		0.07
Styrene	1.03		1.03
Sulfuric acid	<0.01		<0.01
Toluene	9.87	0.07	9.94
Xylene (mixed isomers)	15.33	-0.01	15.32
TOTAL	112.45	7.02	119.47

Note:

a. Methyl Cellosolve Acetate (CAS No. 110-49-6) is a Glycol Ether (Table 51.1). Post-project total emissions for this chemical are accounted for in the Glycol Ethers (Table 51.1) emissions.

Appendix 4

Vopak's Letter to LDEQ of Non-applicability of Subpart FF

Vopak Industrial Infrastructure Americas
2000 West Loop South Suite 1040
Houston, Texas 77027
281.604.6000
www.vopak.com



LDEQ RECEIPT
2023 JUL 31 PM 3:42

June 6, 2023

Louisiana Department of Environmental Quality
Air Permit Division
P.O. Box 4313
Baton Rouge, LA 70821

RECEIVED

AUG 01 2023

**LDEQ/OEC
ENFORCEMENT DIVISION**

**LETTER OF NON-APPLICABILITY DETERMINATION
NESHAP FOR BENZENE WASTE OPERATION – SUBPART FF
VOPAK INDUSTRIAL INFRASTRUCTURE AMERICAS (VIA) ST. CHARLES TERMINAL
AGENCY INTEREST NUMBER 227637**

To whom it may concern,

The VIA St. Charles Terminal is a special warehousing and storage facility that was historically owned and operated by The Dow Chemical Company, Louisiana Operations (Dow). Under Dow's ownership, the emission sources that are now included in the VIA St. Charles Terminal were subject to the requirements of 40 Code of Federal Regulations (CFR) Part 61 Subpart FF (NESHAP for Benzene Waste Operations [BWON]).

VIA took over ownership and began operating the St. Charles Terminal on December 1, 2020. As of that date, the St. Charles Terminal was no longer part of a chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery. The St. Charles Terminal does not contain facilities that treat, store, or dispose of benzene-containing hazardous waste from chemical manufacturing plants, coke by-product recovery plants, or petroleum refineries. As of December 1, 2020, the St. Charles Terminal was no longer an affected facility subject to BWON. Reports submitted for the VIA St. Charles Terminal since December 1, 2020 were not required.

This letter documents the non-applicability determination of the VIA St. Charles Terminal to BWON. If there are any questions concerning this determination, please contact me at 225-320-3726.

Sincerely,

Kelly Phillips
Environmental Engineer

A Royal Vopak company