



Region 6 Enforcement and Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	4/22-23/2019		
Media:	Air		
Regulatory Program(s)	SIP, Title V, NESHAP, NSPS		
Company Name:	LBC Baton Rouge LLC		
Facility Name:	Sunshine Terminal		
Facility Physical Location:	1725 Hwy 75		
(city, state, zip code)	Sunshine, LA 70780-3412		
Mailing address:	2625 Bay Area Blvd. – Suite 200		
(city, state, zip code)	Houston, TX 77058		
Parish:	Iberville Parish		
Facility Contact:	Danielle L. Bush	Regional Manager, Air & Env. Compliance	
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FRS Number:	1100 0957 7145		
Identification/Permit Number:	LDEQ AI # 3492; Title V Permit # 1280-00025-V9 issued 10/17/18		
Media Number:	AFS 22-047-00025		
NAICS:	493190 – Other Warehousing and Storage		
SIC:	4226 – Special Warehousing and Storage		
Personnel participating in inspection:			
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EPA Lead Inspector Signature/Date			6/20/2019
	Debbie Ford		Date
Supervisor Signature/Date			6/20/2019
	Margaret Osbourne		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

Environmental Protection Agency (EPA) Region 6 inspectors Debbie Ford, James Haynes, and Justin Chen arrived at the LBC Baton Rouge LLC (LBC)/Sunshine Terminal (facility or terminal) at 8:40 a.m. on April 22, 2019 for an unannounced inspection. We met with the following individuals for the opening conference:

- Kevin Chimento, Terminal Manager
- Jared Sweatman, EST Coordinator
- Jody Kelley, Operations Supervisor
- T.J. Buffaloe, HSEQ Manager (via video conferencing)
- Danielle Bush, Regional Environmental Manager (via video conferencing)

All three EPA inspectors presented their credentials to Mr. Chimento, Mr. Kelley, and Mr. Sweatman. I 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), which is authorized under Section 114(a) of the CAA. The scope of the inspection is a partial compliance evaluation (PCE) and includes evaluation of the compliance of the facility with applicable New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), and Louisiana State Implementation Plan (SIP) regulations.

During the inspection we took photographs using a Nikon COOLPIX AW120 digital camera and videos using a FLIR Systems GF320 infrared camera. The FLIR GF320 infrared camera is configured so it can visually detect chemicals in the infrared spectrum that are the typical hydrocarbons that can be emitted by facilities such as refineries, oil and gas sites, and other similar industries.

FACILITY DESCRIPTION

The Sunshine Terminal is owned by LBC Baton Rouge, LLC, which is owned by LBC Tank Terminals. It began operation in 1969 as Nordix, Inc. In 1978 Petro United Terminals, Inc. acquired the terminal, and in 2001 LBC took ownership.

The facility is a bulk liquid for-hire, or contract, storage terminal. All of the tanks at the terminal are either vertical fixed roof (VFR) or internal floating roof (IFR) design. The facility leases storage tanks to store liquids on a short-term or long-term basis. The Sunshine Terminal is a major source of hazardous air pollutants (HAPs) as well as a major source for volatile organic compounds (VOCs). As a major source, it is required to operate under a CAA Title V operating permit. The current operating permit for the facility is Permit No. 1280-00025-V9 issued October 17, 2018.

The terminal is located on the Mississippi River. Liquid products are moved into and out of the terminal via tank truck, railcar, barge, or ship. All of the tanks at the site have marine loading/unloading capability. The products can be petroleum products, VOCs, or various inorganic compounds.

Section II - OBSERVATIONS

I provided a list of records (*see Appendix 4*) that we were requesting as part of the inspection. I explained that we would be reviewing the records later, but the primary purpose of the onsite visit was to observe the operation of the facility with the FLIR camera to see if there were any hydrocarbon emissions from equipment. Also, we wanted to discuss their procedures for operating, inspecting, and maintaining their tanks.

Mr. Chimento provided the latest printout of the facility Tank Daily Gauge (*see Appendix 5*). He explained that they do not gauge the tank levels on a daily basis unless it is active (i.e. product moving into or out of the tank). The hand gauging is the official record of the amount of material in a tank. If there is no activity, then the tank is gauged monthly. Some customers request that tank gauging is verified by an independent third-party cargo inspector such as Inspectorate, Caleb Brett, or SGS. This verification is performed monthly. The specific cargo inspector company is determined by LBC's customer.

Due to the nature of the types of products the facility can handle as well as the age of the various tanks, the facility is subject to a wide variety of regulations in the Code of Federal Regulations (C.F.R.):

Regulation	Description	Tanks	Transfer Racks	Piping	LDAR	Vapor Processing Systems or Flares
NSPS (40 C.F.R. Part 60)						
Subpart K	Tanks constructed after 6/11/1973 and prior to 5/19/1978	X				
Subpart Ka	Tanks constructed after 5/18/1978 and prior to 7/23/1984	X				
Subpart Kb	Tanks constructed after 7/23/1984	X				
Subpart XX	Bulk gasoline terminals loading gasoline into tank trucks		X	X		
NESHAP (40 C.F.R. Part 61)						
Subpart J	Leak Detection and Repair (LDAR) program for benzene – refers to Subpart V				X	
Subpart V	LDAR for volatile hazardous air pollutants				X	
Subpart Y	Benzene Emissions from Benzene Storage Vessels	X				
Subpart BB	Benzene Transfer Operations		X			X
NESHAP (40 C.F.R. Part 63)						
Subpart R	Bulk Gasoline Terminals	X	X		X	X
Subpart Y	Marine Tank Vessel Loading Operations	X				X
Subpart SS	Closed Vent Systems - referencing subpart is NESHAP Subpart EEEE					X
Subpart TT	LDAR – Referencing subpart is NESHAP Subpart EEEE				X	
Subpart WW	Referencing subpart is NESHAP Subpart EEEE	X				
Subpart EEEE	Organic Liquids Distribution (OLD MACT)	X	X	X		X

We reviewed the Record Request with Ms. Bush and Mr. Buffaloe so they could begin compiling the records while we observed tanks at the terminal with the FLIR camera.

During the inspection we used the Facility Site Plan (*see Appendix 6*) from the Title V permit application for the current permit, Permit No. 1280-00025-V9. Inspectors identified the internal floating roof (IFR) tanks using an orange highlighter, tanks in benzene service with a pink highlighter, and tanks in natural gasoline service with a yellow/green highlighter on both the Facility Site Plan and the Tank Daily Gauge.

Once in the tank farm, inspectors noted that the tanks did not have eyebrow vents that would allow for observation with the FLIR camera from the ground level. Mr. Chimento stated that they had welded all of the vents shut (*see Appendix 1 - Photo 1*). Inspectors and facility personnel climbed the following tanks to view the fittings on the tank roofs with the FLIR camera:

Tank #	Contents	Roof Type / Primary Seal (1°) / Secondary Seal (2°)	Diameter (feet)	Approximate Capacity (barrels)	Tank Type	Photo #	Video #
55-9	Octene-1	Aluminum pontoon / 1°: Ultraflote US I with Teflon fabric 2°: n/a	100	55,000	IFR	none	none
Observations: Tank 55-9 operates with a nitrogen blanket. No hydrocarbon emissions observed.							
120-1	Raffinate	Aluminum pontoon / 1°: Mechanical shoe with Ultraflote II sec. / 2°: Cast flexible wiper	134	120,000	IFR	13	none
Observations: No hydrocarbon emissions observed. Floor was replaced approximate 1 year ago with a cone up design.							
80-8	Hexene	Aluminum pontoon / 1°: Ultraflote I 2°: n/a	120	55,000	IFR	9 - 12	1, 7
Observations: Tank 80-8 operates with a nitrogen blanket. Hydrocarbon emissions observed from the conservation vent (<i>see AOC #1</i>).							
80-2	Benzene	Aluminum pontoon / 1°: Mechanical shoe / 2°: Cast flexible wiper	120	55,000	IFR	2	2
Observations: Hydrocarbon emissions observed with the FLIR only in high sensitivity mode (HSM). Benzene odors noted by James Haynes and Justin Chen. Mr. Kelly and Mr. Sweatman also confirmed the odors at the time.							
110-2	Benzene	Carbon steel pan / 1°: Mechanical shoe with Teflon fabric 2°: Cast flexible wiper	140.5	110,000	IFR	3	none

Tank #	Contents	Roof Type / Primary Seal (1°) / Secondary Seal (2°)	Diameter (feet)	Approximate Capacity (barrels)	Tank Type	Photo #	Video #
Observations: No hydrocarbon emissions observed.							
110-1	Natural gasoline	Carbon steel pan / 1°: Mechanical shoe with Teflon fabric 2°: Cast flexible wiper	140.5	110,000	IFR	6	4, 5
Observations: Hydrocarbon emissions observed.							

Also, inspectors observed each of the facility's flares* with the FLIR camera:

Flare ID	Description	Material Loaded	Photo #	Video #	Observations
FL-1	Truck Loading Flare (EQT 002)	Ethanol	7,8 (not operating) 17 (nameplate) 18 (crossover piping) 20 (crossover piping locked) 21 (crossover piping locked)	3	Trailing unburned hydrocarbons observed.
FL-2	Marine Loading Flare (EQT 003)	Hexene	10 (smoking) 22 (operating)	8	No emissions observed.
FL-3	Railcar Loading Flare (EQT 042)	Avgas (aviation gas)	7,8 (operating) 14 (railcars being loaded) 15 (blower) 16 (nameplate) 18 (crossover piping) 19 (control panel) 20 (crossover piping locked) 21 (crossover piping locked)	6	

* Although the current operating permit describes each as a "flare," FL-2 at the Marine Dock is actually a vapor combustor. This is discussed below in the Operating Permits section.

OPERATING PERMITS

Operational and physical changes yet no increase in permitted emissions

Petro United received Permit 1280-00025-03 on October 7, 1992 (***see Appendix 7***). With the permit, the marine vapor combustor was included in the permit along with associated fugitive emissions. Petro United also increased throughput and loading rates at the dock and truck rack along with an increase in

permitted tankage throughput. The permit authorized 34 tanks having a total capacity of 1,873,000 bbl and throughput at the dock and truck rack were 25 MM gal/yr of benzene and 45.4 MM gal/yr of benzene, respectively. The permit authorized 290.7 tons/yr of VOC emissions.

Between October 1992 (Permit 1280-00025-03) and October 2018 (current Title V Permit 1280-00025-V9) (*see Appendix 8*), LDEQ has granted twenty permitting actions (minor source, Title V, amendments) that have added railcar loading, railcar flare, additional railcar loading, new tanks, and increased throughput at the dock, truck loading, and tanks. The current Title V permit authorizes 48 tanks having a total capacity of 3,561,000 bbl.

Older permits had details of maximum throughput across the dock and at the truck loading. The current permit doesn't provide an annual maximum operating rate, but it does provide an operating rate for a shorter period of time (e.g., bbl/hr or gal/min). An annual rate can then be calculated based upon the operating time specified for that emission point:

	Operating Rate	Operating Time	Operating Rate (annual)
Permit 1280-00025-03 issued 10/7/1992			
Dock Loading			105.0 MM gal/yr
Truck Loading Flare			45.4 MM gal/yr (benzene)
Permit 1280-00025-V9 issued 10/17/2018			
MARINE RACK – Loading and Unloading Dock	5200 bbl/hr	8760 hr/yr	1,913 MM gal/yr (calculated)
TRUCK RACK – Truck Loading Rack	700 gal/min	8760 hr/yr	367.9 MM gal/yr (calculated)

Sunshine Terminal's applications state that the emissions will remain under the 290.7 tons/yr of VOC emissions and the permitted VOCs remain unchanged (*see AOC #2*).

Annual report of chemicals stored, throughput, and calculated VOC emissions

The current operating permit has Specific Requirement 541 that requires the facility demonstrate compliance with the 270.9 tons/yr VOC permit limit by recording monthly the chemicals stored, the throughput, and the total throughput for the last 12 months. Also, the permit requires the facility to submit an annual report by April 30 showing the chemicals stored, throughput, and the VOC emissions calculated based on the throughput for the preceding calendar year. This is a new requirement in the Title V Permit, and the first report should have been submitted by April 30, 2019 for the 2018 calendar year. I could not locate the report in LDEQ's Electronic Document Management System, or EDMS (*see AOC #3*).

EQT 003 – FL-2 Marine Flare

FL-2 is described in the current operating permit as a flare: Marine Dock Flare. The Title V Permit Specific Requirements 158 – 164 are the flare requirements at 40 C.F.R. § 60.18 and Specific

Requirements 184 – 190 and 213 - 218 are the flare requirements at 40 C.F.R. § 63.11. The device in the pre-Title V permits referred to the device accurately as a combustor. EPA notes that the definition of a flare is a combustion device lacking an enclosed combustion chamber that uses an uncontrolled volume of ambient air to burn gases (40 CFR § 63.641). Because the MVCU does not meet this definition, it does not meet the definition of a flare (*see AOC #4*).

Inaccuracies in the Permit

LDEQ requires that construction must begin on new sources within 2 years of a permit issuance or the authorization of the source becomes invalid. During our inspection, LBC identified several projects that had been permitted but the projects were cancelled:

- In the February 24, 2011 permit (Permit 1280-00025-V2), LBC was authorized to construct several new tanks. The following 7 tanks were never constructed: 55-16, 55-17, 80-10, and 110-5 through 110-8. In the December 30, 2014 permit (Permit 1280-00025-V7), LBC removed 5 of these tanks, but Tanks 80-10 and 110-5 remain in the current Title V Permit 1280-00025-V9.
- In the May 9, 2014 permit, LBC proposed a new railcar rack with 154 loading spots along with increased tank throughput (EQT 074).
- The current Title V permit shows that the facility is applicable to 40 C.F.R. 68 - Risk Management Program, but LBC registered a Risk Management Plan (RMP) on 4/8/11 and de-registered the plan 7/29/11 (*see Appendix 9*) due to cancellation of the proposed project. The RMP noted that the regulated substance was acrylonitrile and the current Title V permit still has permitted emissions of acrylonitrile.
- FL-3 Railcar Flare was authorized in 2001 by Small Source Permit 2761. The terminal constructed the flare and rail loading, but it was never used until the facility began Avgas loading in February 2017.

Errors in the permit can cause confusion in assessing applicability of regulations and determining compliance for regulatory agencies (*see AOC #5*).

LDEQ requires Title V permit applications to be prepared by or under the supervision of a person properly qualified to perform engineering work and certified by a professional engineer (PE)

With the May 31, 2013 application for the Title V Permit 1280-00025-V4 (*see Appendix 10*), LBC began using the consultant Shawn Flannigan from Alliant Environmental, LLC located in Katy, TX. LBC has contracted the same consultant for their Title V permit applications since 2013, for a total of six (6) applications between 2013 and 2018. All applications were signed but none of the applications had a PE stamp under the signature. I searched for Mr. Flannigan's PE License 33081 on the Louisiana Professional Engineering and Land Surveying website and found that Mr. Flannigan's license has been expired since September 30, 2011 (*see Appendix 11*). According to the statement below the license, a licensee must maintain an active license to be able to provide or offer to provide engineering services in Louisiana or use the words "engineer" or "engineering" or any modification or derivative thereof in their name or in connection with their business or activities in Louisiana (*see AOC #6*).

NESHAP Subpart EEEE (OLD MACT)***Notice of Compliance Status (NOCS)***

LBC provided the initial NOCS dated August 13, 2007 (*see Appendix 12*) and identified fourteen (14) tanks (Tanks 55-4, 55-5, 55-6, 55-8, 55-9, 55-10, 55-11, 55-13, 80-6, 80-7, 80-8, 80-9, 120-1, and 120-2) subject to OLD MACT regulations. LBC also identified the total annual transfer of organic liquids out of the facility via the truck rack and rail rack to be less than 800,000 gal/yr.

LBC provided two NOCS letters for new tanks 80-1 and 80-2 (*see Appendix 12*) that were constructed in 2013.

I created a table of tank activity (*see Appendix 13*) using the tanks identified in the NOCS documents, then adding the tank landing information (*see Appendix 14*) (e.g., products, date range of the landings). Some of the records of the tank landings clearly indicated if the tank was cleaned, but in other records it wasn't clear. The shorter duration for a landing would indicate that the tank was likely not cleaned. Tank 110-2 in 2016 was switched from a product that did not require an IFR to benzene service. In this instance, the tank was cleaned, but the record is not clear when benzene was introduced to the tank, the duration of filling before the roof was refloated, or if emissions were controlled (*see AOC #7*).

The names of some of the products are not clear about the constituents that are in the product. For example, tank products were DA120, DA135, alkylate, full range alkylate, and reformat. Under OLD MACT, the definition of **organic liquid** is

- (1) any non-crude liquid or liquid mixture that contains 5 percent by weight or greater of the organic HAP listed in Table 1 to this subpart, as determined using the procedures specified in § 63.2354(c),*
- (2) crude oils downstream of the first point of custody transfer,*
- (3) organic liquids for purposes of this subpart do not include the following liquids: (i) gasoline (including aviation gasoline), kerosene (No. 1 distillate), diesel (No. 2 distillate oil), asphalt, and heavier distillate oils and fuel oils....*

It appears that the constituents of naphtha, alkylate, and reformat have 5 percent by weight or greater of the organic HAP listed in Table 1. Tanks 110-2 and 110-4 were constructed in 2008 after the initial NOCS was submitted. LBC did not provide an NOCS for these tanks, yet they have stored naphtha, benzene, pygas, and reformat (*see AOC #8*).

Overlapping Requirements – Tanks comply with NESHAP Subpart WW

In the OLD MACT NOCS, LBC noted the overlapping requirements with other tank regulations. Specifically, the benzene storage vessels subject to 40 C.F.R. § 61 Subpart Y were listed along with other tanks subject to Subpart EEEE, and LBC stated that compliance with NESHAP Subpart WW was the option selected. The IFR requirements in NESHAP Subpart WW provide three options for the seal configuration: 1) a liquid mounted seal, 2) a mechanical shoe seal, or 3) two seals mounted one above the other, the lower may be vapor-mounted.

LBC provided a listing of their IFR tanks (*see Appendix 15*) that detailed the tank ID, floating roof type, primary seal type, and if applicable, the secondary seal type. According to Mr. Chimento, the IFRs identified as aluminum pontoon are all skin and pontoon design. Tanks 55-4, 55-6, 55-7, 55-10, 55-11, 55-13, and 80-9 all store or have stored organic liquids (benzene and full range alkylate), but they only have a single wiper (vapor-mounted) primary seal (*see AOC #9*).

LBC identified the single wiper primary seal for the tanks in the previous paragraph as Ultraflote II, but the specification sheets (*see Appendix 16*) provided actually identify the roof design as Ultraflote and the seal design as Ultraseal II. According to Mr. Heil, LBC Maintenance Supervisor, the Ultraseal II is made from DuPont Surlyn. Although the Ultraflote documentation indicates the seal is good for benzene service, the DuPont Surlyn Technical Information: Chemical Resistance (*see Appendix 17*) states that in industrial applications, aromatic hydrocarbons have a strong plasticizing action. The aromatic hydrocarbons can be absorbed by the DuPont Surlyn causing swelling, weight gain, softening, and some loss of yield strength. Benzene is identified as a plasticizer and at 70°F is noted as resistant, but at 140°F is considered variable resistant. In 2017-2018 Tank 55-7, which also has only a primary seal identified as Ultraflote II by LBC, stored a toluene/xylene mixture. According to the Chemical Resistance chart, toluene and xylene are both plasticizers and toluene has a chemical resistance code of “U” which is described as “Not resistant. Not recommended for service applications under any conditions” (*see AOC #10*).

LDAR

The facility uses Eagle Environmental to perform the required monitoring. NESHAP Subpart EEEE Table 4 – Work Practice Standards for pumps, valves, and sampling connections that operate in organic liquid services at least 300 hours per year allows for compliance with NESHAP Subpart H, TT, or UU. LBC had elected to comply with NESHAP Subpart TT.

In the records request I asked for the LDAR reports for the facility. Ms. Bush provided two reports for each semi-annual period: VTAP Fugitive Emissions Control Program Semi-Annual Report and NON-HON Fugitive Emissions Control Semi-Annual Report. Neither of these reports state what regulation or permit requirement the report is satisfying. Also, neither of these reports appear to be in the format that is required under NESHAP Subpart TT, so it is not clear if the contractor is monitoring using the proper regulations (*see AOC #11*).

I reviewed the last LDEQ inspection of the facility (*see Appendix 18*) and noted that in 2015, a pump seal had leaked benzene on June 12, 2015. This was reported in the Title V Deviation Report (*see Appendix 18*). I reviewed the 2015 VTAP Semi-annual Report for the first half of 2015 (*see Appendix 18*) and I did not find a reference to reports of the leaking pump (*see AOC #12*).

Compliance Reports

NESHAP Subpart EEEE requires the submittal of semi-annual compliance reports. Table 11 of NESHAP Subpart EEEE details the information that is to be included in these reports, including information from referring subparts to NESHAP Subpart EEEE. As part of the NOCS, LBC identified NESHAP Subpart WW as

the compliance method for the tanks which had overlapping requirements with other regulations. Similarly, for equipment leak components (i.e., pumps, valves, sampling connections), LBC identified compliance with NESHAP Subpart TT as its compliance method for overlapping requirements. I reviewed the Compliance Reports (*see Appendix 19* for the 2018 reports) and LBC did not include all of the required information in the Compliance Reports (*see AOC #13*).

TANK REQUIREMENTS

NSPS Subpart Kb

The terminal has tanks that are regulated by varying regulations due to their age (i.e., NSPS K, Ka, Kb). When a new tank is constructed, reconstructed, or modified, it will be subject to NSPS Subpart Kb and is required to meet the control requirements depending on the maximum true vapor pressure of the product stored in the tank. Under NSPS Subpart A requirements, the owner/operator is required to submit a Notification of Initial Startup within 15 days of actual startup. For internal floating roof tanks, the owner/operator is required to submit a report that describes the control equipment and certifies that the control equipment meets the NSPS Subpart Kb specifications for IFR tanks. This report shall be attached to the Notification of Initial Startup. The four newest tanks at LBC are Tanks 80-1, 80-2, 55-14, and 55-15. I located the startup notifications for all the tanks but Tank 55-14 (*see Appendix 20*) which according to the Tank Landings for 2017 (*see Appendix 14*), was put into service on February 18, 2017 (*see AOC #14*). LBC did not provide the IFR tank certification report for all four of the new tanks (*see AOC #15*).

NSPS requires for new tanks that the IFR, the primary seal, and if applicable, the secondary seal is visually inspected for holes, tears, or other openings in the seals or seal fabric or defects in the IFR. The facility is required to provide 30-day notice in writing prior to the filling of the tank to afford the opportunity to have an observer present. The following table was compiled from several notifications and records (*see Appendix 21*) related to new tanks 55-14 and 55-15 (*see AOC #16*):

	Tank 55-14	Tank 55-15
Completion of construction	11/9/16 (est startup: 11/18/16)	11/9/16
Inspection Notification	7-day notice dated 11/3/16 (received by LDEQ 11/10/16) (anticipates 11/9/16)	7-day notice dated 11/3/16 (received by LDEQ 11/10/16) (anticipates 11/9/16)
Actual inspection	11/8/16	No record provided
Initial Startup	2/18/17 (no notification) (from Tank Landings 2017)	12/2/16 (letter dated 12/14/16)

Every time the IFR tank is emptied and degassed and at least every 10 years, the facility is required to perform an internal inspection. If the inspection is planned, the facility is required to provide a 30-day notice in writing prior to the filling of the tank to afford the opportunity to have an observer present. If the inspection was unplanned and the owner/operator could not have known about the inspection 30 days in advance of refilling the tank, the owner/operator shall notify by telephone at least 7 days prior to refilling of the tank. Immediately following the telephone notification, the owner/operator shall

provide written documentation demonstrating why the inspection was unplanned. Alternatively, the notification and written documentation may be made in writing and sent by express mail so that it is received at least 7 days prior to the refilling.

In 2017 LBC provided 7-day notifications of inspections for Tank 15-2, 120-1, and 120-2 (**see Appendix 22**):

- Tank 15-2 – Notice was dated January 4, 2017 which stated that the anticipated inspection would be on or after January 10, 2017. It was received by LDEQ on January 11, 2017. From the Tank Landings records, Tank 15-2 was landed from December 29, 2016 to July 2, 2017.
- Tank 120-1 – Notice was dated November 10, 2017 which stated that the anticipated inspection would be on or after November 16, 2017. From the Tank Landings records, Tank 120-1 was landed from May 27, 2017 to December 21, 2017.
- Tank 120-2 - Notice was dated April 18, 2017 which stated that the anticipated inspection would be on or after April 24, 2017. It was received by LDEQ on April 24, 2017. From the Tank Landings records, Tank 120-2 was landed from April 21, 2017 to December 30, 2017.

All of the notifications of inspections that I have reviewed were 7-day notices, yet it is clear that the tanks had more than 30 days for inspection notifications. None of these notifications follow the requirements in NSPS Subpart Kb (**see AOC #17**).

NSPS Subpart Kb requires tanks to have annual visual inspections of the floating roof and the primary or secondary seal (if one is in service) through the manholes and roof hatches on the fixed roof. These rooftop inspections are to look for the following inspection failures:

- IFR is not resting on the surface of the liquid product
- Liquids accumulated on the roof
- Seal is detached
- Holes or tears in the seal fabric

Every time a tank is emptied and degassed, NSPS Subpart Kb requires an internal inspection of the IFR, seals, seal fabric, and deck fittings to ensure they are meeting Subpart Kb requirements. The regulations state that the owner/operator shall keep a record of each inspection identifying the tank, the date of the inspection, and the observed condition of each component of the control equipment (seals, IFR, and fittings).

LBC uses the same form for both the annual visual inspection (**see Appendix 23**), referred to as an external inspection by LBC, and the internal inspection (**see Appendix 24**). None of the internal inspections have "Internal Inspection" circled on the forms, but one form had both circled. Also, Tanks 15-2, 20-1, and 55-8 all state that the IFR is not floating on the liquid, yet the Tank Landings records do not indicate that these tanks were landed at the time of the inspection. The forms provided as external inspections also include tanks that "Internal Inspection" is circled on some forms or circled and crossed out on others. The external inspections are performed by the operations personnel at LBC. The internal inspections are performed by the maintenance personnel.

I asked about the procedures for the external inspections at LBC. Mr. Chimento said that he has his personnel perform external inspections monthly. He explained that they perform the inspection from the gauging hatch, which is approximately 8 inches, and the manways, which are approximately 18-20 inches. I asked if they break the plane of the opening to see better, and he told me they do not. I asked how they can see the entire roof if they do not break the plane. He told me that they are looking for liquids on the roof, and they have limited view beyond the area directly below the opening.

For tanks that are in organic liquid service, they would be subject to NESHAP Subpart WW. Many of the NSPS Subpart Kb requirements are similar in NESHAP Subpart WW with one notable exception: instead of looking for visible gaps, NESHAP Subpart WW requires the testing for gaps greater than 1/8 inch (**see AOC #18**).

We noted that Tank 110-1 through 110-4 were constructed in 2008. The American Petroleum Institute requires an initial API 653 inspection at 10 years to establish a corrosion rate. Thus, LBC should have emptied and degassed the tanks in 2018 for the required inspection. At the time of the inspection, I observed hoses around Tanks 110-1 and 110-4. Mr. Chimento explained that they were preparing to be emptied and degassed for the API inspection. Mr. Chimento also stated that the other two tanks would be inspected next year (**see AOC # 19**).

Mr. Chimento explained that when a tank is emptied and degassed, the facility brings in a portable unit to combust the vapors from the tank. The companies they hire are from Texas. To date they have used three companies: O-Zone Industrial Services, LLC, Gen Mobile, and Pro-Act. I explained that they need to ensure that the companies have a unit that is permitted to operate in Louisiana as a portable source. Once permitted, when it is moved from location to location, they only need approval from LDEQ to relocate it (**see AOC #20**). Mr. Buffaloe and Ms. Bush were not aware that the terminal was bringing in a portable unit. The permit has separate emission points identified as Tank Cleaning and Tank Degas. I asked how these emission points were used since the emission point name sounded like they would be describing similar emissions, but I did not get an answer.

FL-3 RAILCAR FLARE (EQT 042)

The Railcar Flare is an air-assisted flare that LBC constructed in 2001. On March 29, 2005, Emission Testing Services tested the flare pursuant to 40 C.F.R. § 60.18. According to Mr. Chimento, they never operated the railcar loading until 2017 when they received a contract to load Avgas. We observed trailing unburned hydrocarbons from the flare with the FLIR camera. We noted that the control panel for the flare had a BTU reading. LBC confirmed that they installed a calorimeter to measure BTU content at the flare. We also noted on the control panel that a low BTU alarm had occurred recently (**see AOC #21**).

We observed a crossover line between the truck loading flare header and the railcar loading flare header (**see Appendix 1 – Photo 18**). The valve was closed but it was not locked. If the valve were opened, this would allow emissions to divert to the other device. If the other flare were not lit at the time, this would allow a bypass of the control device and vent the emissions to the atmosphere (**see AOC #21**). While we were onsite, operators placed a lock on the bypass line (**see Appendix 2 – Photos 20 and 22**).

Section III – AREAS OF CONCERN

AOC #1- EPA observed hydrocarbon emissions using the FLIR camera from Tank 80-8 in hexene service although the tank operated with a nitrogen blanket.

AOC #2 – Over a 20-year period, LBC has permitted significant increases in operational throughput at the truck loading, marine loading, and tank emission points. LBC has also constructed new storage tanks and a new railcar loading operation. With all of the changes, the permitted VOCs have not changed from 290.7 tons/yr. The original limit was prior to the Title V permitting program, and even though the permitting guidelines for Title V permits states that permits are based upon potential to emit, the permitted VOCs did not increase.

AOC #3 – LBC did not submit the annual report of chemicals stored, throughput, and calculated VOC emissions for 2018 by April 30, 2019.

AOC #4 – The vapor combustor at the Marine Dock is inaccurately identified in the Title V permit as a flare. The identification of the control device as a flare may be bypassing testing requirements in LDEQ regulations.

AOC #5 – The current Title V permit doesn't reflect equipment and operations at the site.

AOC #6 - LBC has submitted six Title V permit applications since 2013 that were prepared by an individual who was not qualified to provide engineering services in Louisiana.

AOC #7 - LBC did not keep clear records of when a tank had landed, if the tank was cleaned and degassed, and when the cleaning was complete, which would end any emissions from the roof being landed.

AOC #8 - LBC did not provide a NESHAP Subpart EEEE NOCS for Tanks 110-2 and 110-4 that have stored organic liquids.

AOC #9 - Tanks 55-4, 55-6, 55-7, 55-10, 55-11, 55-13, and 80-9 all store or have stored organic liquids (benzene and full range alkylate), but do not meet the seal requirements of NESHAP Subpart WW.

AOC #10 – LBC may be using a seal material that is incompatible with the product stored in the tank.

AOC #11 – The LDAR contractor may not be monitoring using the proper regulations.

AOC #12 – The LDAR report for First Half of 2015 did not report the leaking benzene pump.

AOC #13 – NESHAP Subpart EEEE Compliance Reports do not contain all of the required information.

AOC #14 - LBC did not provide a Notification of Initial Startup within 15 days after such date for new tanks 55-14.

AOC #15 – LBC did not provide a report that describes the control equipment for Tanks 80-1, 80-2, 55-14, and 55-15 and certifies that the control equipment meets the NSPS Subpart Kb specifications for internal floating roofs.

AOC #16 – LBC did not provide a 30-day notice of internal inspection for new IFR tanks 55-14 and 55-15.

AOC #17 – LBC is not providing proper notification of inspections when a tank is inspected after emptying and degassing the tank.

AOC #18 – LBC is not performing and documenting external and internal inspections of IFR tanks as required.

AOC #19 – LBC failed to perform API 653 inspections on Tanks 110-1 through 110-4 at an initial 10-year interval.

AOC #20 – LBC may be operating a portable unit to destroy degassing vapors that has not been permitted to operate in Louisiana.

AOC #21 – FL-3 Railcar Flare has unburned hydrocarbons and may be having low BTU issues.

AOC #22 - Bypasses to flares operated without a car seal or flow meter to indicate if the control device was bypassed.

Section IV – FOLLOW UP

On May 2, 2019 I received additional information requested during the inspection. These records included the OLD MACT Notice of Compliance Status dated August 13, 2007.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 22 photos taken 4/22-23/2019

Appendix 2 – Video Log – 8 FLIR videos taken 4/22-23/2019

Appendix 3 – Inspection sign-in sheet

Appendix 4 – Record Request

Appendix 5 – Tank Daily Gauge as of 4/18/2019

Appendix 6 – Facility Site Plan

Appendix 7 – Permit 1280-00025-03 issued 10/7/1992, selected pages

Appendix 8 – Current Title V Permit 1280-00025-V9 issued 10/17/2018, selected pages

Appendix 9 – RMP registration and de-registration dates for the Sunshine Terminal

Appendix 10 – Title V Permit 1280-00025-V4 application, selected pages
Appendix 11 – Shawn Flannigan Louisiana PE License 0033081 – expired 9/30/2011
Appendix 12 – NESHAP Subpart EEEE NOCS – Initial and Tanks 80-1 and 80-2
Appendix 13 - Tank Activity 2015-2018
Appendix 14 - Tank Landings 2015-2018
Appendix 15 - Sunshine Terminal Tank Table
Appendix 16 – Ultraflote and Ultraseal Specification Sheets
Appendix 17 – DuPont Surlyn Technical Information: Chemical Resistance
Appendix 18 – 2017 LDEQ Inspection Report, selected pages, Title V Deviation Report 1H 2015,
and VTAP LDAR Report 1H 2015
Appendix 19 – NESHAP Subpart EEEE Semi-annual Compliance Reports for 2018
Appendix 20 – NSPS Notification of Initial Startup – Tanks 80-1, 80-2, 55-15
Appendix 21 – Tanks 55-14 and 55-15
Appendix 22 –7-day Inspection Notifications for Tanks 15-2, 120-1, 120-2 in 2017
Appendix 23 – External Inspection Forms 2016
Appendix 24 – Internal Inspection Forms 2018

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0367-00.JPG
Date/Time of Photo: 4/22/2019 10:54 AM (corrected)
Photographer: Debbie Ford
Description: Welded eyebrow vent on **EQT 036 - Tank 80-6**. This is an example of the other tanks at the facility that have had eyebrow vents welded closed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo No. 2

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0368-00.JPG
Date/Time of Photo: 4/22/2019 11:26 AM (corrected)
Photographer: James Haynes
Description: **EQT 072 - Tank 80-2** roof - conservation vents.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1

Photograph Log

Photo No. 3

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0369-00.JPG
 Date/Time of Photo: 4/22/2019 3:24 PM (corrected)
 Photographer: Justin Chen
 Description: **EQT 058 - Tank 110-2** nameplate.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1

Photograph Log

Photo No. 4

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0370-00.JPG
 Date/Time of Photo: 4/22/2019 3:27 PM (corrected)
 Photographer: Justin Chen
 Description: **EQT 060 - Tank 110-4** nameplate.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1

Photograph Log

Photo No. 5

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0371-00.JPG
 Date/Time of Photo: 4/22/2019 3:30 PM (corrected)
 Photographer: Justin Chen
 Description: **EQT 059 - Tank 110-3** nameplate.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 6

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0372-00.JPG
Date/Time of Photo: 4/22/2019 3:30 PM (corrected)
Photographer: Justin Chen
Description: **EQT 057 - Tank 110-1** nameplate.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 7

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0373-00.JPG
Date/Time of Photo: 4/23/2019 8:29 AM (corrected)
Photographer: Debbie Ford
Description: **EQT 001 - FL-1 Truck Loading Flare** (right): not operating
EQT 042 - RAIL FL-3 Railcar Loading Flare (left): operating to control emissions from Avgas (aviation gas) loading.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo No. 8

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0375-00.JPG
Date/Time of Photo: 4/23/2019 8:36 AM (corrected)
Photographer: Debbie Ford
Description: **EQT 001 - FL-1 Truck Loading Flare** (left): not operating
EQT 042 - RAIL FL-3 Railcar Loading Flare (right): operating to control emissions from Avgas loading.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo No. 9

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0376-00.JPG
Date/Time of Photo: 4/23/2019 8:49 AM (corrected)
Photographer: Debbie Ford
Description: **EQT 038 - Tank 80-8** – tank gauging using electronic gauge by LBC employee with concurrence by third party contractor SGS.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1

Photograph Log

Photo No. 10

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0378-00.JPG
Date/Time of Photo: 4/23/2019 8:55 AM (corrected)
Photographer: Debbie Ford
Description: View towards dock area from roof of **EQT 038 - Tank 80-8**. Note light smoke from **EQT 003 - MARINE FL-2 Marine Loading Flare**. Prior to photo, James Haynes observed flames. Photographer Debbie Ford observed heavy smoke when she turned around to observe the vapor combustor unit.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 11

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0379-00.JPG
Date/Time of Photo: 4/23/2019 9:00 AM (corrected)
Photographer: Debbie Ford
Description: **EQT 038 - Tank 80-8** - nitrogen blanket control system.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 12

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0380-00.JPG
Date/Time of Photo: 4/23/2019 9:01 AM (corrected)
Photographer: Debbie Ford
Description: **EQT 038 - Tank 80-8** – nameplate.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo No. 13

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0381-00.JPG
Date/Time of Photo: 4/23/2019 9:06 AM (corrected)
Photographer: Debbie Ford
Description: **EQT 047 - Tank 120-1** – stripping line. Note oil staining on valve. Solvent-like odors noted on 4/22/2019 and 4/23/2019.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 14

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0382-00.JPG
Date/Time of Photo: 4/23/2019 9:19 AM (corrected)
Photographer: Debbie Ford
Description: Railcar loading of Avgas



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 15

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0383-00.JPG
Date/Time of Photo: 4/23/2019 9:30 AM (corrected)
Photographer: Debbie Ford
Description: **EQT 042 - FL-3 Railcar Loading Flare - blower.**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo No. 16

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0384-00.JPG
Date/Time of Photo: 4/23/2019 9:32 AM (corrected)
Photographer: Debbie Ford
Description: **EQT 042 - FL-3 Railcar Loading Flare** - nameplate indicating 2001 construction date.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 17

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0385-00.JPG
Date/Time of Photo: 4/23/2019 9:34 AM (corrected)
Photographer: Debbie Ford
Description: **EQT 002 - FL-1 Truck Loading Flare** - nameplate indicating 1985 construction.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 18

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0386-01.JPG
Date/Time of Photo: 4/23/2019 9:38 AM (corrected)
Photographer: Debbie Ford
Description: Crossover line between **EQT 002 - FL-1 Truck Loading Flare** and **EQT 042 - FL-3 Railcar Loading Flare**. Closed position. No lock to prevent bypass of control device.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo No. 19

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0387-00.JPG

Date/Time of Photo: 4/23/2019 9:42 AM (corrected)

Photographer: Debbie Ford

Description: **EQT 042 - FL-3 Railcar Loading Flare** – control panel. At the top of the panel (in the red area) is a display of a low BTU alarm on 4/20/2019 at 1:44.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo No. 20

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0388-00.JPG
Date/Time of Photo: 4/23/2019 9:45 AM (corrected)
Photographer: Debbie Ford
Description: Crossover line between **EQT 002 - FL-1 Truck Loading Flare** and **EQT 042 - FL-3 Railcar Loading Flare**. Lockout tag added after discussion with EPA inspectors.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo No. 21

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0389-00.JPG
Date/Time of Photo: 4/23/2019 9:45 AM (corrected)
Photographer: Debbie Ford
Description: Crossover line between **EQT 002 - FL-1 Truck Loading Flare** and **EQT 042 - FL-3 Railcar Loading Flare**. Lockout tag added after discussion with EPA inspectors.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 22

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Photo File Name: DSCN0390-00.JPG
Date/Time of Photo: 4/23/2019 1:45 PM (corrected)
Photographer: Debbie Ford
Description: **EQT 003 - MARINE FL-2** - Marine Loading Flare at dock area on the Mississippi River. Operating to control emissions of hexene loading from Tank 80-8.

Appendix 2

Video Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA



Video No: 1
 File Name: [MOV_0154-01.mp4](#)
 Date/Time: 4/22/2019 10:57 AM (corrected)
 Videographer: Justin Chen
 Description: **Tank 80-8** – conservation vent with visible hydrocarbon emissions. Tank is nitrogen blanketed and in hexene service.



Video No: 2
 File Name: [MOV_0155-01.mp4](#)
 Date/Time: 4/22/2019 11:26 AM (corrected)
 Videographer: James Haynes
 Description: **Tank 80-2** - conservation vent. Tank is in benzene service. Odors noted by James Haynes & Justin Chen. Hydrocarbon emissions observed in HSM, but not easily seen in normal mode.



Video No: 3
 File Name: [MOV_0157-01.mp4](#)
 Date/Time: 4/22/2019 11:46 AM (corrected)
 Videographer: James Haynes
 Description: **FL-1 - Truck Loading Flare** (right): operating with trailing unburned hydrocarbons during loading of ethanol.
RAIL FL-3 - Railcar Loading Flare (left): not operating.



Video No: 4
 File Name: [MOV_0158-00.mp4](#)
 Date/Time: 4/22/2019 3:38 PM (corrected)
 Videographer: James Haynes
 Description: **Tank 110-1** – conservation vent with visible hydrocarbon emissions. Tank is in natural gasoline service.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

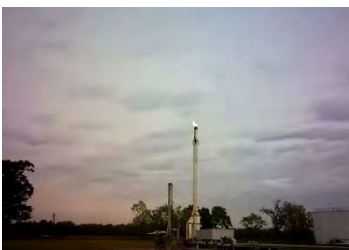
Video Log

Location: LBC Baton Rouge, LLC – Sunshine Terminal		
City: Sunshine	Iberville Parish	State: LA

**Video No: 5**File Name: [MOV_0159-00.mp4](#)

Date/Time: 4/22/2019 3:40 PM (corrected)

Videographer: James Haynes

Description: **Tank 110-1** – conservation vent with intermittent visible hydrocarbon emissions. Tank is in natural gasoline service.**Video No: 6**File Name: [MOV_0161-00.mp4](#)

Date/Time: 4/23/2019 8:39 AM (corrected)

Videographer: James Haynes

Description: **RAIL FL-3 - Railcar Loading Flare** - loading Avgas from Tank 55-14. Visible hydrocarbon emissions trailing after heat dissipation from flame.**Video No: 7**File Name: [MOV_0163-01.mp4](#)

Date/Time: 4/23/2019 8:50 AM (corrected)

Videographer: Justin Chen

Description: **Tank 80-8** – conservation tank with visible hydrocarbon emissions. Tank is nitrogen blanketed and in hexene service.**Video No: 8**File Name: [MOV_0165-00.mp4](#)

Date/Time: 4/23/2019 1:51 PM (corrected)

Videographer: Justin Chen

Description: **MARINE FL-2 - Marine Loading Flare** - loading hexene from Tank 80-8. No trailing emissions observed.

Appendix 3

Inspection Sign-In Sheet



Meeting with: LBC Baton Rouge, LLC - Sunshine Terminal
 Purpose of meeting: CAA Inspection

April 22, 2019

	Name	Title	Representing	e-Mail	Phone
1	DEBBIE FORD	ENV. SCIENTIST	U.S. EPA Region 6	Ford.debbie@epa.gov	214-665-7235
2	James Haynes	Physical Scientist	EPA Region 6	haynes.james@epa.gov	214-665-8546
3	Justin Chen	Env. Engineer	EPA Region 6	chen.justin@epa.gov	214-665-7273
4	Kevin Chimento	Terminal Manager	LBC Baton Rouge	K K-chimento@lbctt.com	225-314-2188
5	James Sweatman	EST Coordinator	LBC Baton Rouge	J-Sweatman@lbctt.com	225-505-7581
6	Jody Kelley	Operations Supervisor	LBC Baton Rouge	J-Kelley@lbctt.com	225-314-2198
7	T.J. Buffalo	HSEQ Manager	LBC Houston	T.J.-Buffalo@lbctt.com	281-291-3438
8	Danielle Bush	Environmental Manager (Regional)	LBC Houston	D-Bush@lbctt.com	281-291-3418
9	DARREZ HEIL	MAINTENANCE SUPERVISOR	LBC Baton Rouge	d-heil@lbctt.com	225-314-3194
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LBC #101

Appendix 4

Record Request

LBC Baton Rouge LLC - Sunshine Terminal
EPA Record Request - 4/22/2019

	Description	Period
	Current operating permit(s) and application(s).	
	Plot plan (current) with each tank ID	
	Listing of all tanks, year constructed, material stored, capacity, diameter, height, tank type (cone roof, IFR, EFR, CVS w/ control), applicable regulations. If floating roof, type of floating roof, type of primary seal, and type of secondary seal (if applicable)	
	Vapor pressure analysis/documentation of each material stored	
	Strapping table for each tank including levels when the vacuum breaker opens and the level when the tank rests on it legs (if adjustable, high and low settings)	
	To what standards (e.g. API, ASTM) were each tank built and maintained?	
	Procedures for inspection, maintenance of tanks	
	Any policy, guidance, or interpretation of regulations and what that means for the operation of the tank or controls.	
	Spreadsheet or database used to track inspections/repairs	
	Current inventory for each tank - material stored, level	
	How are tank levels recorded?	
	Are roof landings included in the facility permit(s)? Provide a listing of tanks that have been landed, when they were landed, and the duration of the landing.	5 years
	How are roof landings tracked/documented? Are different emission factors used for Emission Inventory reporting?	
	Title V reports (ACC, Semi-annual Monitoring and Deviation Reports	5 years
	Provide all notifications and/or record of communication for fill/refill of IFR storage vessels to LDEQ	5 years
	Provide copies of records of inspection (i.e. prior to filling the tank, roof top inspections, internal inspections each time emptied/degasses). If no internal inspection w/in 5 years, provide records of the last internal inspection. Include: Storage vessel ID, date of inspection, observed condition of each component of the control eqt (seals, IFR, and fittings)	5 years
	Provide all reports to LDEQ of failed roof top visual inspections	5 years
	Provide all reports to LDEQ of failed internal inspections	5 years
	Provide certif rpt to LDEQ for all new IFR tanks	since 2014
	NESHAP Subpart EEEE (OLD MACT) Notice of Compliance Status	
	OLD MACT Semi-annual Compliance Reports	5 years
	Compliance method for each tank subject ot EEEE	
	Last performance test record for each flare.	
	Leak Detection and Repair (LDAR) reports	5 years

Appendix 5

Tank Daily Gauge as of 4/18/2019

TANK DAILY GAUGE

Line capacities not included.

TANK : 10-1	DATE : 04/01/2019	GRS BRL : 0.00	DENSITY : 8.34540	MAX GAUG: 31' 3 0/16"
CUST :	TEMP : 32.00	NET BRL : 0.00	CALC METHOD :	MAX VOL : 8,863.91
PROD : <i>water</i>	GAUG : 0' 0 0/16"	NET LBS : 0	LBS VAR : 0	AVAIL VOL : 8,863.91
	LOW LEV : 0' 0 0/16"	NET GAL : 0	BRL VAR : 0.00	MIN VOL : 5.16
TANK : 12-1	DATE : 04/01/2019	GRS BRL : 0.00	DENSITY : 6.53000	MAX GAUG: 37' 6 0/16"
CUST :	TEMP : 32.00	NET BRL : 0.00	CALC METHOD : TAB 6B	MAX VOL : 11,785.14
PROD : EMPTY	GAUG : 0' 0 0/16"	NET LBS : 0	LBS VAR : 0	AVAIL VOL : 11,785.14
	LOW LEV : 0' 0 0/16"	NET GAL : 0	BRL VAR : 0.00	MIN VOL : 8.50
TANK : 12-2	DATE : 04/01/2019	GRS BRL : 0.00	DENSITY : 6.53000	MAX GAUG: 37' 6 0/16"
CUST :	TEMP : 32.00	NET BRL : 0.00	CALC METHOD : [REDACTED]	MAX VOL : 11,782.06
PROD : [REDACTED] <i>empty</i>	GAUG : 0' 0 0/16"	NET LBS : 0	LBS VAR : Diesel	AVAIL VOL : 11,782.06
	LOW LEV : 0' 0 0/16"	NET GAL : 0	BRL VAR : 0 0.00	MIN VOL : 7.53
TANK : 15-1	DATE : 04/01/2019	GRS BRL : 0.00	DENSITY : 8.34540	MAX GAUG: 0' 0 0/16"
CUST :	TEMP : 32.00	NET BRL : 0.00	CALC METHOD :	MAX VOL : 12,782.00
PROD : <i>decommissioned</i>	GAUG : 0' 0 0/16"	NET LBS : 0	LBS VAR : 0	AVAIL VOL : 12,782.00
	LOW LEV : 0' 0 0/16"	NET GAL : 0	BRL VAR : 0.00	MIN VOL : 0.00
TANK : 15-2	DATE : 04/01/2019	GRS BRL : 824.45	DENSITY : 7.31375	MAX GAUG: 36' 0 0/16"
CUST : [REDACTED]	TEMP : 66.80	NET BRL : 822.31	CALC METHOD : TAB 6D	MAX VOL : 13,502.88
PROD : EHC 110 P-1072	GAUG : 2' 4 6/16"	NET LBS : 252,286	LBS VAR : 0	AVAIL VOL : 12,678.43
	LOW LEV : 5' 3 0/16"	NET GAL : 34,537	BRL VAR : 0.00	MIN VOL : 1,906.16
TANK : 20-1	DATE : 04/01/2019	GRS BRL : 163.47	DENSITY : 7.31829	MAX GAUG: 31' 0 0/16"
CUST : [REDACTED]	TEMP : 71.80	NET BRL : 161.92	CALC METHOD : TAB 6D	MAX VOL : 19,354.82
PROD : EHC 110 P-1072	GAUG : 0' 4 8/16"	NET LBS : 49,726	LBS VAR : 0	AVAIL VOL : 19,191.35
	LOW LEV : 4' 1 0/16"	NET GAL : 13,510	BRL VAR : 0.00	MIN VOL : 2,487.88
TANK : 25-1	DATE : 04/15/2019	GRS BRL : 11,934.81	DENSITY : 8.20952	MAX GAUG: 36' 6 0/16"
CUST : [REDACTED]	TEMP : 63.00	NET BRL : 11,921.56	CALC METHOD : TAB 6B Custspecific Air	MAX VOL : 22,862.91
PROD : Fuel Oil Blendstocks	GAUG : 19' 1 4/16"	NET LBS : 4,110,552	LBS VAR : 9,502	AVAIL VOL : 10,928.10
	LOW LEV : 0' 0 0/16"	NET GAL : 500,706	BRL VAR : 6.47	MIN VOL : 20.50
TANK : 25-2	DATE : 04/16/2019	GRS BRL : 8,232.92	DENSITY : 7.13677	MAX GAUG: 36' 3 0/16"
CUST : [REDACTED]	TEMP : 101.00	NET BRL : 8,081.60	CALC METHOD : TAB 6B Custspecific Air	MAX VOL : 22,754.55
PROD : Fuel Oil Blendstocks	GAUG : 13' 1 6/16"	NET LBS : 2,422,414	LBS VAR : -45,181	AVAIL VOL : 14,521.63
	LOW LEV : 0' 0 0/16"	NET GAL : 339,427	BRL VAR : -153.47	MIN VOL : 17.73

L/BC 005

TANK DAILY GAUGE

Line capacities not included.

TANK : 50-1	DATE : 04/14/2019	GRS BRL : 6,023.24	DENSITY : 8.13031	MAX GAUG: 38' 4 0/16"
CUST : [REDACTED]	TEMP : 68.10	NET BRL : 6,004.93	CALC METHOD : TAB 6B	MAX VOL : 47,743.53
PROD : Light Cycle Oil: P-1066	GAUG : 5' 3 15/16"	NET LBS : 2,050,522	LBS VAR : -95,038	AVAIL VOL : 41,720.29
	LOW LEV : 0' 0 0/16"	NET GAL : 252,207	BRL VAR : -531.73	MIN VOL : 0.30
TANK : 55-1	DATE : 04/01/2019	GRS BRL : 81.82	DENSITY : 7.22860	MAX GAUG: 38' 5 0/16"
CUST : [REDACTED]	TEMP : 60.00	NET BRL : 81.82	CALC METHOD : TAB 6D	MAX VOL : 53,352.36
PROD : [REDACTED] Neutral Oil 220R: P-1051	GAUG : 0' 2 14/16"	NET LBS : 24,809	LBS VAR : 0	AVAIL VOL : 53,270.54
	LOW LEV : 0' 0 0/16"	NET GAL : 3,436	BRL VAR : 0.00	MIN VOL : 5.30
TANK : 55-2	DATE : 04/01/2019	GRS BRL : 278.11	DENSITY : 7.22860	MAX GAUG: 38' 4 0/16"
CUST : [REDACTED]	TEMP : 60.00	NET BRL : 278.05	CALC METHOD : TAB 6D	MAX VOL : 53,665.08
PROD : [REDACTED] Neutral Oil 220R: P-1051	GAUG : 0' 2 0/16"	NET LBS : 84,328	LBS VAR : 0	AVAIL VOL : 53,386.97
	LOW LEV : 0' 0 0/16"	NET GAL : 18,529	BRL VAR : 0.00	MIN VOL : 163.70
TANK : 55-3	DATE : 04/01/2019	GRS BRL : 157.75	DENSITY : 7.23304	MAX GAUG: 37' 11 0/16"
CUST : [REDACTED]	TEMP : 60.00	NET BRL : 157.75	CALC METHOD : TAB 6D	MAX VOL : 52,903.50
PROD : [REDACTED] Neutral Oil 220R: P-1051	GAUG : 0' 2 4/16"	NET LBS : 47,863	LBS VAR : 0	AVAIL VOL : 52,745.75
	LOW LEV : 0' 0 0/16"	NET GAL : 6,625	BRL VAR : 0.00	MIN VOL : 17.63
TANK : 55-4	DATE : 04/01/2019	GRS BRL : 44,716.58	DENSITY : 7.36620	MAX GAUG: 36' 6 0/16"
CUST : [REDACTED]	TEMP : 67.00	NET BRL : 44,509.24	CALC METHOD : Hydrocarbons Benzene	MAX VOL : 51,123.37
PROD : Benzene: P-1052	GAUG : 32' 0 15/16"	NET LBS : 13,770,356	LBS VAR : 3	AVAIL VOL : 6,406.79
	LOW LEV : 5' 2 0/16"	NET GAL : 1,883,707	BRL VAR : 0.01	MIN VOL : 7,348.37
TANK : 55-5	DATE : 04/01/2019	GRS BRL : 0.00	DENSITY : 7.36620	MAX GAUG: 35' 4 0/16"
CUST : [REDACTED]	TEMP : 32.00	NET BRL : 0.00	CALC METHOD : Hydrocarbons Benzene	MAX VOL : 49,371.55
PROD : [REDACTED]	GAUG : 0' 0 0/16"	NET LBS : 0	LBS VAR : 0	AVAIL VOL : 49,371.55
	LOW LEV : 6' 5 0/16"	NET GAL : 0	BRL VAR : 0.00	MIN VOL : 9,034.08
TANK : 55-6	DATE : 04/01/2019	GRS BRL : 30,583.68	DENSITY : 7.36500	MAX GAUG: 36' 6 0/16"
CUST : [REDACTED]	TEMP : 66.00	NET BRL : 30,461.12	CALC METHOD : Hydrocarbons Benzene	MAX VOL : 50,894.21
PROD : Benzene: P-1052	GAUG : 21' 11 10/16"	NET LBS : 9,422,538	LBS VAR : -27,116	AVAIL VOL : 20,310.53
	LOW LEV : 5' 4 0/16"	NET GAL : 1,279,367	BRL VAR : -87.67	MIN VOL : 7,347.89
TANK : 55-7	DATE : 04/08/2019	GRS BRL : 39,751.01	DENSITY : 5.87797	MAX GAUG: 36' 6 0/16"
CUST : [REDACTED]	TEMP : 64.50	NET BRL : 39,611.57	CALC METHOD : TAB 6B	MAX VOL : 50,633.57
PROD : Full Range Alkylate: P-1037	GAUG : 28' 8 7/16"	NET LBS : 9,779,116	LBS VAR : -11,588	AVAIL VOL : 10,882.56
	LOW LEV : 5' 2 0/16"	NET GAL : 1,672,820	BRL VAR : -46.94	MIN VOL : 6,902.21

TANK DAILY GAUGE

Line capacities not included.

TANK : 55-8	DATE : 04/01/2019	GRS BRL : 48,086.47	DENSITY : 7.36500	MAX GAUG: 36' 6 0/16"
CUST : [REDACTED]	TEMP : 63.00	NET BRL : 47,990.25	CALC METHOD : Hydrocarbons Benzene	MAX VOL : 50,415.65
PROD : Benzene: P-1052	GAUG : 34' 10 0/16"	NET LBS : 14,844,855	LBS VAR : 0	AVAIL VOL : 2,329.18
	LOW LEV : 5' 2 0/16"	NET GAL : 2,022,444	BRL VAR : 0.00	MIN VOL : 6,647.95
TANK : 55-9	DATE : 04/11/2019	GRS BRL : 14,651.87	DENSITY : 5.99700	MAX GAUG: 36' 6 0/16"
CUST : [REDACTED]	TEMP : 67.00	NET BRL : 14,576.55	CALC METHOD : [REDACTED] Octene-1	MAX VOL : 50,994.24
PROD : Octene-1	GAUG : 10' 6 0/16"	NET LBS : 3,671,519	LBS VAR : 17,882	AVAIL VOL : 36,342.37
	LOW LEV : 5' 2 0/16"	NET GAL : 627,655	BRL VAR : 71.02	MIN VOL : 7,204.54
TANK : 55-10	DATE : 04/01/2019	GRS BRL : 37,802.99	DENSITY : 7.36620	MAX GAUG: 36' 6 0/16"
CUST : [REDACTED]	TEMP : 63.00	NET BRL : 37,729.26	CALC METHOD : Hydrocarbons Benzene	MAX VOL : 50,982.69
PROD : Benzene: P-1052	GAUG : 27' 0 12/16"	NET LBS : 11,672,694	LBS VAR : 0	AVAIL VOL : 13,179.70
	LOW LEV : 4' 7 0/16"	NET GAL : 1,584,629	BRL VAR : 0.01	MIN VOL : 6,423.20
TANK : 55-11	DATE : 04/01/2019	GRS BRL : 27,467.65	DENSITY : 7.36620	MAX GAUG: 36' 6 0/16"
CUST : [REDACTED]	TEMP : 65.00	NET BRL : 27,378.63	CALC METHOD : Hydrocarbons Benzene	MAX VOL : 51,213.61
PROD : Benzene: P-1052	GAUG : 19' 5 12/16"	NET LBS : 8,470,411	LBS VAR : 0	AVAIL VOL : 23,745.96
	LOW LEV : 4' 11 0/16"	NET GAL : 1,149,902	BRL VAR : 0.00	MIN VOL : 7,149.42
TANK : 55-13	DATE : 04/15/2019	GRS BRL : 46,441.47	DENSITY : 7.36500	MAX GAUG: 36' 6 0/16"
CUST : [REDACTED]	TEMP : 72.00	NET BRL : 46,077.45	CALC METHOD : Hydrocarbons Benzene	MAX VOL : 51,085.08
PROD : Benzene: P-1052	GAUG : 33' 2 2/16"	NET LBS : 14,253,140	LBS VAR : 1,222	AVAIL VOL : 4,643.61
	LOW LEV : 5' 1 0/16"	NET GAL : 1,935,563	BRL VAR : 3.96	MIN VOL : 7,213.32
TANK : 55-14	DATE : 04/16/2019	GRS BRL : 41,648.72	DENSITY : 5.88090	MAX GAUG: 35' 1 0/16"
CUST : [REDACTED]	TEMP : 66.50	NET BRL : 41,420.24	CALC METHOD : TAB 6B	MAX VOL : 48,783.03
PROD : Avgas 100LL: P-1009	GAUG : 29' 11 14/16"	NET LBS : 10,230,728	LBS VAR : -36,722	AVAIL VOL : 7,134.31
	LOW LEV : 4' 9 0/16"	NET GAL : 1,748,931	BRL VAR : -139.70	MIN VOL : 6,322.70
TANK : 55-15	DATE : 04/16/2019	GRS BRL : 27,911.89	DENSITY : 6.58000	MAX GAUG: 35' 1 0/16"
CUST : [REDACTED]	TEMP : 64.00	NET BRL : 27,846.37	CALC METHOD : [REDACTED]	MAX VOL : 48,863.81
PROD : Fuel Ethanol	GAUG : 20' 1 10/16"	NET LBS : 7,695,659	LBS VAR : Ethanol	AVAIL VOL : 20,951.92
	LOW LEV : 4' 10 0/16"	NET GAL : 1,178,774	BRL VAR : 214,292 775.52	MIN VOL : 6,486.30
TANK : 80-1	DATE : 04/13/2019	GRS BRL : 47,007.01	DENSITY : 7.36500	MAX GAUG: 36' 0 0/16"
CUST : [REDACTED]	TEMP : 68.00	NET BRL : 46,762.15	CALC METHOD : Hydrocarbons Benzene	MAX VOL : 72,000.64
PROD : Benzene: P-1052	GAUG : 23' 7 5/16"	NET LBS : 14,465,031	LBS VAR : -38,097	AVAIL VOL : 24,993.63
	LOW LEV : 4' 7 0/16"	NET GAL : 1,983,364	BRL VAR : -123.16	MIN VOL : 8,679.75

TANK DAILY GAUGE

Line capacities not included.

TANK : 80-2	DATE : 04/01/2019	GRS BRL : 10,533.16	DENSITY : 7.36620	MAX GAUG: 36' 0 0/16"
CUST : [REDACTED]	TEMP : 63.00	NET BRL : 10,511.59	CALC METHOD : Hydrocarbons Benzene	MAX VOL : 71,627.17
PROD : Benzene: P-1052	GAUG : 5' 7 13/16"	NET LBS : 3,252,175	LBS VAR : 0	AVAIL VOL : 61,094.01
	LOW LEV : 4' 7 0/16"	NET GAL : 460,911	BRL VAR : 0.00	MIN VOL : 8,385.54
TANK : 80-3	DATE : 04/01/2019	GRS BRL : 76,579.80	DENSITY : 8.97799	MAX GAUG: 38' 0 0/16"
CUST : [REDACTED]	TEMP : 112.90	NET BRL : 75,233.52	CALC METHOD : TAB 6B	MAX VOL : 76,842.30
PROD : Slurry: P-1034	GAUG : 37' 10 7/16"	NET LBS : 28,368,723	LBS VAR : 4	AVAIL VOL : 262.50
	LOW LEV : 0' 0 0/16"	NET GAL : 3,159,808	BRL VAR : 0.01	MIN VOL : 369.07
TANK : 80-4	DATE : 04/01/2019	GRS BRL : 66,065.85	DENSITY : 7.14975	MAX GAUG: 37' 6 0/16"
CUST : [REDACTED]	TEMP : 62.10	NET BRL : 66,010.51	CALC METHOD : TAB 6D	MAX VOL : 76,359.24
PROD : EHC 50: P-1068	GAUG : 32' 4 11/16"	NET LBS : 19,797,516	LBS VAR : 1	AVAIL VOL : 10,293.39
	LOW LEV : 0' 0 0/16"	NET GAL : 2,789,833	BRL VAR : 0.00	MIN VOL : 899.33
TANK : 80-5	DATE : 04/01/2019	GRS BRL : 48,982.82	DENSITY : 7.14975	MAX GAUG: 37' 6 0/16"
CUST : [REDACTED]	TEMP : 60.10	NET BRL : 48,981.35	CALC METHOD : TAB 6D	MAX VOL : 76,436.05
PROD : EHC 50: P-1068	GAUG : 23' 10 3/16"	NET LBS : 14,690,191	LBS VAR : 1	AVAIL VOL : 27,453.23
	LOW LEV : 0' 0 0/16"	NET GAL : 2,057,217	BRL VAR : 0.00	MIN VOL : 1,017.03
TANK : 80-6	DATE : 04/01/2019	GRS BRL : 18,773.26	DENSITY : 7.36500	MAX GAUG: 34' 7 0/16"
CUST : [REDACTED]	TEMP : 63.30	NET BRL : 18,736.01	CALC METHOD : Hydrocarbons Benzene	MAX VOL : 68,820.46
PROD : Benzene: P-1052	GAUG : 9' 8 10/16"	NET LBS : 5,795,675	LBS VAR : 0	AVAIL VOL : 50,047.20
	LOW LEV : 5' 5 0/16"	NET GAL : 800,549	BRL VAR : 0.00	MIN VOL : 10,118.79
TANK : 80-7	DATE : 04/14/2019	GRS BRL : 53,568.62	DENSITY : 7.36500	MAX GAUG: 34' 7 0/16"
CUST : [REDACTED]	TEMP : 74.00	NET BRL : 53,083.33	CALC METHOD : Hydrocarbons Benzene	MAX VOL : 68,888.24
PROD : Benzene: P-1052	GAUG : 26' 11 9/16"	NET LBS : 16,420,266	LBS VAR : 16,348	AVAIL VOL : 15,319.62
	LOW LEV : 5' 8 0/16"	NET GAL : 2,229,500	BRL VAR : 52.85	MIN VOL : 10,751.80
TANK : 80-8	DATE : 04/02/2019	GRS BRL : 24,910.18	DENSITY : 5.64480	MAX GAUG: 36' 6 0/16"
CUST : [REDACTED]	TEMP : 64.60	NET BRL : 24,795.07	CALC METHOD : [REDACTED]	MAX VOL : 73,324.86
PROD : Hexene-1	GAUG : 12' 5 9/16"	NET LBS : 5,878,492	LBS VAR : -29,583	AVAIL VOL : 48,414.68
	LOW LEV : 5' 3 0/16"	NET GAL : 1,050,280	BRL VAR : -124.78	MIN VOL : 10,395.54
TANK : 80-9	DATE : 04/09/2019	GRS BRL : 73,157.57	DENSITY : 5.86628	MAX GAUG: 36' 6 0/16"
CUST : [REDACTED]	TEMP : 64.00	NET BRL : 72,932.09	CALC METHOD : TAB 6B	MAX VOL : 73,346.60
PROD : Full Range Alkylate: P-1037	GAUG : 36' 4 14/16"	NET LBS : 17,969,312	LBS VAR : 15,397,191	AVAIL VOL : 189.03
	LOW LEV : 5' 2 0/16"	NET GAL : 3,077,111	BRL VAR : 62,465.94	MIN VOL : 10,285.50

TANK DAILY GAUGE

Line capacities not included.

TANK : 100-1	DATE : 04/17/2019	GRS BRL : 66,157.43	DENSITY : 7.90159	MAX GAUG: 38' 5 0/16"
CUST : [REDACTED]	TEMP : 115.60	NET BRL : 64,716.82	CALC METHOD : TAB 6B	MAX VOL : 94,561.05
PROD : Vacuum Gas Oil Blend: P-1028	GAUG : 27' 1 6/16"	NET LBS : 21,477,363	LBS VAR : -35,090	AVAIL VOL : 28,403.62
	LOW LEV : 0' 0 0/16"	NET GAL : 2,718,106	BRL VAR : -277.34	MIN VOL : 0.31
TANK : 110-1	DATE : 04/05/2019	GRS BRL : 62,898.51	DENSITY : 5.47682	MAX GAUG: 35' 1 0/16"
CUST : [REDACTED]	TEMP : 63.30	NET BRL : 62,511.50	CALC METHOD : TAB 6B	MAX VOL : 96,487.84
PROD : Natural Gasoline P-0012	GAUG : 22' 11 0/16"	NET LBS : 14,379,341	LBS VAR : -31,966	AVAIL VOL : 33,589.33
	LOW LEV : 4' 1 0/16"	NET GAL : 2,646,491	BRL VAR : -139.98	MIN VOL : 10,929.05
TANK : 110-2	DATE : 04/13/2019	GRS BRL : 95,481.24	DENSITY : 7.36500	MAX GAUG: 35' 1 0/16"
CUST : [REDACTED]	TEMP : 66.00	NET BRL : 95,055.98	CALC METHOD : Hydrocarbons Benzene	MAX VOL : 97,123.97
PROD : Benzene: P-1052	GAUG : 34' 5 14/16"	NET LBS : 29,403,735	LBS VAR : -24,740	AVAIL VOL : 1,642.73
	LOW LEV : 4' 1 0/16"	NET GAL : 4,006,942	BRL VAR : -79.99	MIN VOL : 11,495.47
TANK : 110-3	DATE : 04/16/2019	GRS BRL : 65,615.89	DENSITY : 5.97926	MAX GAUG: 35' 1 0/16"
CUST : [REDACTED]	TEMP : 68.90	NET BRL : 65,039.01	CALC METHOD : TAB 6B	MAX VOL : 96,684.23
PROD : Naphtha: P-1035	GAUG : 23' 10 2/16"	NET LBS : 16,333,176	LBS VAR : -378,925	AVAIL VOL : 31,068.34
	LOW LEV : 4' 1 0/16"	NET GAL : 2,731,639	BRL VAR : -2,403.35	MIN VOL : 11,063.49
TANK : 110-4	DATE : 04/09/2019	GRS BRL : 20,104.18	DENSITY : 6.31197	MAX GAUG: 35' 1 0/16"
CUST : [REDACTED]	TEMP : 61.10	NET BRL : 19,955.82	CALC METHOD : TAB 6B	MAX VOL : 96,834.39
PROD : Naphtha: P-1035	GAUG : 7' 3 8/16"	NET LBS : 5,290,343	LBS VAR : 77,917	AVAIL VOL : 76,730.21
	LOW LEV : 4' 1 0/16"	NET GAL : 838,144	BRL VAR : 107.60	MIN VOL : 11,252.76
TANK : 120-1	DATE : 04/01/2019	GRS BRL : 107,727.12	DENSITY : 7.19334	MAX GAUG: 44' 3 0/16"
CUST : [REDACTED]	TEMP : 62.40	NET BRL : 107,603.00	CALC METHOD : TAB 6B	MAX VOL : 109,985.54
PROD : Reformate: P-1036	GAUG : 43' 4 4/16"	NET LBS : 32,509,094	LBS VAR : 0	AVAIL VOL : 2,258.42
	LOW LEV : 4' 10 0/16"	NET GAL : 4,536,041	BRL VAR : 0.00	MIN VOL : 10,747.02
TANK : 120-2	DATE : 04/01/2019	GRS BRL : 85,989.75	DENSITY : 7.18896	MAX GAUG: 44' 4 0/16"
CUST : [REDACTED]	TEMP : 62.60	NET BRL : 85,881.47	CALC METHOD : TAB 6B	MAX VOL : 112,958.82
PROD : Mixed Xylene: P-1053	GAUG : 33' 7 14/16"	NET LBS : 25,930,735	LBS VAR : 0	AVAIL VOL : 26,969.07
	LOW LEV : 3' 10 0/16"	NET GAL : 3,607,022	BRL VAR : 0.00	MIN VOL : 10,739.09
TANK : 150-1	DATE : 04/15/2019	GRS BRL : 117,721.52	DENSITY : 7.38240	MAX GAUG: 47' 10 0/16"
CUST : [REDACTED]	TEMP : 107.70	NET BRL : 115,313.84	CALC METHOD : TAB 6B	MAX VOL : 149,484.06
PROD : Fuel Oil Products	GAUG : 37' 8 2/16"	NET LBS : 35,754,301	LBS VAR : -45,465	AVAIL VOL : 31,762.54
	LOW LEV : 0' 0 0/16"	NET GAL : 4,843,181	BRL VAR : -187.96	MIN VOL : 191.91

TANK DAILY GAUGE

Line capacities not included.

TANK : 150-2	DATE : 04/01/2019	GRS BRL : 138,998.98	DENSITY : 7.58167	MAX GAUG: 47' 10 0/16"
CUST : [REDACTED]	TEMP : 109.00	NET BRL : 136,182.48	CALC METHOD : TAB 6B	MAX VOL : 149,517.16
PROD : Fuel Oil Products	GAUG : 44' 5 11/16"	NET LBS : 43,364,606	LBS VAR : 0	AVAIL VOL : 10,518.18
	LOW LEV : 0' 0 0/16"	NET GAL : 5,719,664	BRL VAR : 0.00	MIN VOL : 141.00
TANK : 150-3	DATE : 04/01/2019	GRS BRL : 16,773.38	DENSITY : 7.56708	MAX GAUG: 39' 0 0/16"
CUST : [REDACTED]	TEMP : 134.20	NET BRL : 16,229.56	CALC METHOD : TAB 6B	MAX VOL : 142,875.81
PROD : Vacuum Gas Oil Blend: P-1028	GAUG : 5' 5 15/16"	NET LBS : 5,158,130	LBS VAR : 0	AVAIL VOL : 126,102.43
	LOW LEV : 0' 0 0/16"	NET GAL : 715,690	BRL VAR : 0.00	MIN VOL : 0.28
TANK : 150-4	DATE : 04/10/2019	GRS BRL : 128,776.07	DENSITY : 7.90159	MAX GAUG: 39' 0 0/16"
CUST : [REDACTED]	TEMP : 140.30	NET BRL : 124,714.15	CALC METHOD : TAB 6B	MAX VOL : 143,004.33
PROD : Vacuum Gas Oil Blend: P-1028	GAUG : 35' 2 11/16"	NET LBS : 41,388,483	LBS VAR : 22,202	AVAIL VOL : 14,228.26
	LOW LEV : 0' 0 0/16"	NET GAL : 5,237,994	BRL VAR : 66.90	MIN VOL : 0.28

Appendix 6

Facility Site Plan

Appendix 7
Permit 1280-00025-03
issued 10/7/1992, selected pages



State of Louisiana

Department of Environmental Quality



Edwin W. Edwards
Governor

Kai David Midboe
Secretary

Mr. C. Paul Roubieu, Jr.
Senior Vice President of Operations
PetroUnited Terminals, Inc.
11666 Port Road
Seabrook, TX 77586

Dear Mr. Roubieu:

RE: Permit modification, Sunshine Terminal, PetroUnited
Terminals, Inc., Sunshine, Iberville Parish, Louisiana

This is to inform you that the permit modification requested for the above referenced facility has been approved under LAC 33:III.505. 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.

The permit number cited below should be referenced in future correspondence regarding this facility.

Done this 7th day of OCT., 1992.

Permit No.: 1280-00025-03

Very truly yours,

Gustave A. Von Bodungen
Gustave A. Von Bodungen, P.E.
Assistant Secretary

GVB:PH:das

c: Capital Regional Office



recycled paper

OFFICE OF AIR QUALITY

P.O. BOX 82135

BATON ROUGE, LOUISIANA 70854-2135

AN EQUAL OPPORTUNITY EMPLOYER

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

**SUNSHINE TERMINAL
PETROUNITED TERMINALS, INC.
SUNSHINE, IBERVILLE PARISH, LOUISIANA**

Estimated emissions for Sunshine Terminal are as follows:

EMISSIONS (TPY)			
<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	8.6	8.6	0
SO ₂	94.2	94.2	0
NO _x	47.3	47.3	0
CO	4.2	4.2	0
VOC**	251.2	290.7	+ 39.5

Permitted emissions corrected for round off error.

** Includes 1.5 TPY of benzene. Materials change according to client's requirements; therefore, no speciation is available. A list of materials handled by the terminal during the past four years is given below:

Volatile Organic Compounds -

Benzene	Ethylbenzene
Methyl Ethyl Ketone	Carbon Tetrachloride
Isopropanol	Methyl Tertiary Butyl Ether
Ethanol	Isononyl Alcohol
Toluene	Methanol
Xylene	Ethylene Glycol Bottoms

Petroleum Product -

Nonene	Naphtha
Vacuum Gas Oil	Gasoline Tertiary Butyl Alcohol
Carbon Black	No. 6 Fuel Oil
Tetramer L	Light Blending Aromatic
Pyrolysis Gas	Crude Oil

Various Inorganic Compounds mainly caustic

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

**SUNSHINE TERMINAL
PETROUNITED TERMINALS, INC.
SUNSHINE, IBERVILLE PARISH, LOUISIANA**

The dock collection system for benzene emissions is designed to comply with the Coast Guard Regulations for Marine Controls. Benzene vapors are sent to a combustor which has 98% or greater removal efficiency. Barges loaded are certified leak tight and loading lines are nitrogen purged prior to disconnect. Benzene emissions from truck loading are controlled by an air assisted flare with 98% or better efficiency.

Sunshine Terminal is subject to all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 61, Subpart J-National Emission Standards for Equipment Leaks (Fugitive Emission Sources) of Benzene, Subpart V-National Emission Standards for Equipment Leaks (Fugitive Emission Sources), and Subpart BB-National Emission Standards for Benzene Emissions from Benzene Transfer Operations.

Tanks 150-1 and 150-2 shall comply with all applicable provisions of New Source Performance Standards, 40 CFR 60, 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.

IV. TYPE OF REVIEW

This permit was reviewed for compliance with Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration regulations do not apply.

V. PUBLIC NOTICE

Public notice is not required for a minor modification.

SPECIFIC CONDITIONS

**SUNSHINE TERMINAL
PETROUNITED TERMINALS, INC.
SUNSHINE, IBERVILLE PARISH, LOUISIANA**

1. The permittee shall kept updated Material Safety Data sheets on all materials stored and a record of the tank, type, vapor pressure, and amount of materials stored and transferred. The records shall be on site and available for review by Air Quality Compliance Division.

An annual report submitted by March 1 for the previous calendar year shall be sent to the Air Quality Compliance Division. The report shall include a summary of materials stored and the annual emissions, speciated by pollutant.

2. The permittee shall comply with all applicable requirements of National Emission Standards for Hazardous Air Pollutants, 40 CFR 61, Subpart J-National Emission Standards for Equipment Leaks (Fugitive Emission Sources) of Benzene and Subpart V-National Emission Standards for Equipment Leaks (Fugitive Emission Sources).
3. The permittee shall comply with all applicable requirements of National Emission Standards for Hazardous Air Pollutants, 40 CFR 61, Subpart BB-National Emission Standards for Benzene Emissions from Benzene Transfer Operations.
4. The permittee shall ensure destruction of emissions to the flare, Emission Point 1-85, and the combustor, Emission Point 1-91, by maintaining the heat content of the gas to be combusted above 300 BTU/scf.
5. The permittee shall store crude oil only in Tanks 150-1 and 150-2, Emission Points 12-77 and 13-77. These tanks shall comply with all applicable provisions of NSPS, 40 CFR 60, 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.
6. The permittee shall use slow loading of initial 2 feet and slow loading of final 2 feet of the barges in order to reduce emissions from the barge loading operation. The bulk loading rate may be allowed to reach the maximum rate only after the first 2 feet of slow loading has been achieved. The permittee shall incorporate this procedure in the operating manual which must be kept at the facility and must be used by the operators. Any deviation from this procedure shall be considered a violation of this permit.

AIR QUALITY DATA SHEET

PAGE 1

SUNSHINE TERMINAL PETROUNITED TERMINALS, INC. SUNSHINE, IBERVILLE PARISH, LOUISIANA

Location of plant: 15 UTM: 677.7 Km E 3351.9 Km NDescription of location: On Hwy 75, south of Sunshine, LA just east of Hwy 327.

Estimated starting date _____ Estimated starting operation _____

of construction _____ will begin Operating

Type of Dispersion Calculations Used: _____

EFFECTS ON AMBIENT AIR

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Air Quality Standard (NAAQS)
-----------	-------------	--	--

NEW _____	OR MODIFIED <u>X</u>	EMISSION SOURCES	<u>Petroleum Terminal</u> (Type of Source)
-----------	----------------------	------------------	---

Emission Point No.	Description	Operating Rate (Max) or Tank Capacity	Operating Schedule		
			H/D	D/W	W/Y
1-68	Cone Roof Tank 20-1	20,000 bbl	24	7	52
2-68	Cone Roof Tank 35-1	35,000 bbl	24	7	52
1-77	Cone Roof Tank 55-1	55,000 bbl	24	7	52
4-77	Ship and Barge Loading Dock	105.0 MM gal/yr	24	7	52
5-77	Cone Roof, Internal Pan Tank 80-2	80,000 bbl	24	7	52
6-77	Cone Roof Tank 80-1	80,000 bbl	24	7	52
8-77	Cone Roof Tank 10-1	10,000 bbl	24	7	52
12-77	Floating Roof Tank 150-1	150,000 bbl	24	7	52
13-77	Floating Roof Tank 150-2	150,000 bbl	24	7	52
29-78	Cone Roof Tank 12-1	12,500 bbl	24	7	52
30-78	Cone Roof Tank 12-2	12,500 bbl	24	7	52
31-78	Cone Roof Tank 12-3	12,500 bbl	24	7	52

**AIR QUALITY DATA SHEET
PAGE 1 (CONTINUED)**

**SUNSHINE TERMINAL
PETROUNITED TERMINALS, INC.
SUNSHINE, IBERVILLE PARISH, LOUISIANA**

Emission Point No.	Description	Operating Rate (Max) or Tank Capacity	Operating Schedule		
			H/D	D/W	W/Y
32-78	Cone Roof Tank 12-4	12,500 bbl	24	7	52
33-78	Cone Roof Tank 15-1	15,000 bbl	24	7	52
34-78	Cone Roof Tank 15-2	15,000 bbl	24	7	52
35-78	Cone Roof Tank 25-1	25,000 bbl	24	7	52
36-78	Cone Roof Tank 25-2	25,000 bbl	24	7	52
37-78	Cone Roof Tank 55-2	55,000 bbl	24	7	52
38-78	Cone Roof Tank 55-3	55,000 bbl	24	7	52
39-78	Cone Roof, Internal Pan Tank 55-4	55,000 bbl	24	7	52
40-78	Cone Roof, Internal Pan Tank 55-5	55,000 bbl	24	7	52
41-78	Cone Roof, Internal Pan Tank 55-6	55,000 bbl	24	7	52
42-78	Cone Roof Tank 55-7	55,000 bbl	24	7	52
43-78	Cone, Internal Pan Tank 55-8	55,000 bbl	24	7	52
44-78	Cone Roof Tank 80-3	80,000 bbl	24	7	52
45-78	Cone Roof Tank 80-4	80,000 bbl	24	7	52
46-78	Cone Roof Tank 80-5	80,000 bbl	24	7	52
47-78	Truck Loading Rack	22 MM gal/yr	24	7	52
1-80	700 HP Cleaver-Brooks Boiler	856,000 gal/yr No. 6 Fuel Oil	12	7	52
2-80	700 HP Cleaver-Brooks Boiler	856,000 gal/yr No. 6 Fuel Oil	12	7	52
3-80	Cone Roof, Internal Pan Tank 80-6	80,000 bbl	24	7	52
4-80	Cone Roof, Internal Pan Tank 80-7	80,000 bbl	24	7	52
1-81	Cone Roof, Internal Pan Tank 55-9	55,000 bbl	24	7	52
2-81	Cone Roof, Internal Pan Tank 55-10	55,000 bbl	24	7	52
3-81	Cone Roof, Internal Pan Tank 55-11	55,000 bbl	24	7	52

**AIR QUALITY DATA SHEET
PAGE 1 (CONTINUED)**

**SUNSHINE TERMINAL
PETROUNITED TERMINALS, INC.
SUNSHINE, IBERVILLE PARISH, LOUISIANA**

Emission Point No.	Description	Operating Rate (Max) or Tank Capacity	Operating Schedule		
			H/D	D/W	W/Y
5-81	Cone Roof, Internal Pan Tank 55-13	55,000 bbl	24	7	52
6-81	Cone Roof, Internal Pan Tank 80-8	80,000 bbl	24	7	52
7-81	Cone Roof Tank 80-9	80,000 bbl	24	7	52
1-85	Truck Loading Rack Flare	45.4 MM gal/yr Benzene	24	7	52
2-85	Fugitive Hydrocarbon Emissions	NA	24	7	52
1-91	Benzene Combustor	25.0 MM gal/yr Benzene	24	7	52
		12.75 MM BTU/hr Natural Gas			

* Average emission rate is calculated at 1/3 facility usage.

AIR QUALITY DATA SHEET
PAGE 2

SUNSHINE TERMINAL
PETROUNITED TERMINALS, INC.
SUNSHINE, IBERVILLE PARISH, LOUISIANA

MAXIMUM/AVERAGE EMISSION RATES ARE LISTED IN LB/HR

Emission Point No.	Permitted Emissions						HEIGHT Feet	TEMP. °F	FLOW RATE CFM
	PM ₁₀	SO ₂	NO _x	VOC	CO	OTHER			
1-68	-	-	-	4.2 /1.5	-	-	33	Ambient	NA
2-68	-	-	-	3.0 /1.4	-	-	35	Ambient	NA
1-77	-	-	-	4.5 /2.1	-	-	48	Ambient	NA
4-77	-	-	-	166.4 /10.9	-	-	NA	Ambient	NA
5-77	-	-	-	0.57 /0.57	-	-	40	Ambient	NA
6-77	-	-	-	6.9 /3.2	-	-	40	Ambient	NA
8-77	-	-	-	0.79 /0.37	-	-	40	Ambient	NA
12-77	-	-	-	1.0 /1.0	-	-	40	Ambient	NA
13-77	-	-	-	1.0 /1.0	-	-	40	Ambient	NA
29-78	-	-	-	2.6 /0.95	-	-	40	Ambient	NA
30-78	-	-	-	2.6 /0.95	-	-	40	Ambient	NA
31-78	-	-	-	1.0 /0.48	-	-	40	Ambient	NA
32-78	-	-	-	1.0 /0.48	-	-	40	Ambient	NA
33-78	-	-	-	1.2 /0.58	-	-	40	Ambient	NA
34-78	-	-	-	3.3 /1.2	-	-	40	Ambient	NA
35-78	-	-	-	2.1 /0.97	-	-	40	Ambient	NA
36-78	-	-	-	2.1 /0.97	-	-	40	Ambient	NA
37-78	-	-	-	4.7 /2.2	-	-	40	Ambient	NA
38-78	-	-	-	4.7 /2.2	-	-	40	Ambient	NA
39-78	-	-	-	4.7 /2.2	-	-	40	Ambient	NA
40-78	-	-	-	0.48 /0.47	-	-	40	Ambient	NA
41-78	-	-	-	1.3 /1.2	-	-	40	Ambient	NA

**AIR QUALITY DATA SHEET
PAGE 2**

**SUNSHINE TERMINAL
PETROUNITED TERMINALS, INC.
SUNSHINE, IBERVILLE PARISH, LOUISIANA**

MAXIMUM/AVERAGE EMISSION RATES ARE LISTED IN LB/HR

Emission Point No.	Permitted Emissions						HEIGHT Feet	TEMP. °F	FLOW RATE CFM
	PM ₁₀	SO ₂	NO _x	VOC	CO	OTHER			
42-78	-	-	-	4.7 /2.2	-	-	40	Ambient	NA
43-78	-	-	-	4.7 /2.2	-	-	40	Ambient	NA
44-78	-	-	-	6.9 /3.2	-	-	40	Ambient	NA
45-78	-	-	-	9.0 /3.3	-	-	40	Ambient	NA
46-78	-	-	-	9.0 /3.3	-	-	40	Ambient	NA
47-78	-	-	-	33.8 /1.5	-	-	NA	Ambient	NA
1-80	2.0 /0.98	21.5 /10.7	10.8 /5.4	0.26 /0.13	0.98 /0.49	-	28.5	300	10,770
2-80	2.0 /0.98	21.5 /10.7	10.8 /5.4	0.26 /0.13	0.98 /0.49	-	28.5	300	10,770
3-80	-	-	-	0.57 /0.57	-	-	40	Ambient	NA
4-80	-	-	-	0.57 /0.57	-	-	40	Ambient	NA
1-81	-	-	-	0.48 /0.47	-	-	40	Ambient	NA
2-81	-	-	-	0.48 /0.47	-	-	40	Ambient	NA
3-81	-	-	-	0.48 /0.47	-	-	40	Ambient	NA
5-81	-	-	-	0.48 /0.47	-	-	40	Ambient	NA
6-81	-	-	-	0.92 /0.92	-	-	40	Ambient	NA
7-81	-	-	-	6.9 /3.2	-	-	40	Ambient	NA
1-85	-	-	-	0.22 /0.22	-	-	25	100	320
2-85	-	-	-	6.2 /6.2	-	Benzene 0.07 /0.0014	NA	Ambient	NA
1-91	0.061 /0.001	0.007 /Neg.	1.7 /0.032	0.034 /0.001	0.42 /0.008	Benzene 5.9 /0.11	50	1500	10,780

AIR QUALITY DATA SHEET
PAGE 3

SUNSHINE TERMINAL
PETROUNITED TERMINALS, INC.
SUNSHINE, IBERVILLE PARISH, LOUISIANA

EMISSION POINT NO.	TONS PER YEAR					
	PM ₁₀	SO ₂	NO _x	VOC	CO	OTHER
1-68	-	-	-	6.5	-	-
2-68	-	-	-	6.2	-	-
1-77	-	-	-	9.1	-	-
4-77	-	-	-	47.5	-	-
5-77	-	-	-	2.5	-	-
6-77	-	-	-	14.0	-	-
8-77	-	-	-	1.6	-	-
12-77	-	-	-	4.4	-	-
13-77	-	-	-	4.4	-	-
29-78	-	-	-	4.2	-	-
30-78	-	-	-	4.2	-	-
31-78	-	-	-	2.1	-	-
32-78	-	-	-	2.1	-	-
33-78	-	-	-	2.5	-	-
34-78	-	-	-	5.0	-	-
35-78	-	-	-	4.2	-	-
36-78	-	-	-	4.2	-	-
37-78	-	-	-	9.6	-	-
38-78	-	-	-	9.6	-	-
39-78	-	-	-	9.6	-	-
40-78	-	-	-	2.1	-	-
41-78	-	-	-	5.2	-	-
42-78	-	-	-	9.6	-	-
43-78	-	-	-	9.6	-	-
44-78	-	-	-	14.0	-	-
45-78	-	-	-	14.5	-	-
46-78	-	-	-	14.5	-	-
47-78	-	-	-	6.6	-	-
1-80	4.2	47.1	23.6	0.55	2.1	-
2-80	4.2	47.1	23.6	0.55	2.1	-
3-80	-	-	-	2.5	-	-
4-80	-	-	-	2.5	-	-
1-81	-	-	-	2.1	-	-

**AIR QUALITY DATA SHEET
PAGE 3 (CONTINUED)**

**SUNSHINE TERMINAL
PETROUNITED TERMINALS, INC.
SUNSHINE, IBERVILLE PARISH, LOUISIANA**

EMISSION POINT NO.	TONS PER YEAR					
	PM ₁₀	SO ₂	NO _x	VOC	CO	OTHER
2-81	-	-	-	2.1	-	-
3-81	-	-	-	2.1	-	-
5-81	-	-	-	2.1	-	-
6-81	-	-	-	4.0	-	-
7-81	-	-	-	14.0	-	-
1-85	-	-	-	-	-	Benzene 0.96
2-85	-	-	-	27.1	-	Benzene 0.006
1-91	0.005	0.001	0.14	0.003	0.036	Benzene 0.48
Total	8.6	94.2	47.3	289.2 Benzene + 1.5 Total VOC 290.7	4.2	Benzene 1.5

Appendix 8
Current Title V Permit 1280-00025-V9
issued 10/17/2018, selected pages

JOHN BEL EDWARDS
GOVERNOR



CHUCK CARR BROWN, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No. 7017 2620 0001 0653 3434

Activity No.: PER20180002
Agency Interest No. 3492

Mr. Jeremy Alberty
Director of Operations
LBC Baton Rouge, LLC
2625 Bay Area BLVD., Ste. 200
Houston, TX 77058

RE: Part 70 Operating Permit Modification
LBC Baton Rouge LLC - Sunshine Terminal
Sunshine, Iberville Parish, Louisiana

Dear Mr. Alberty:

This is to inform you that the 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 23 of January, 2023, 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 17th day of October, 2018.

Permit No.: 1280-00025-V9

Sincerely,

A handwritten signature in black ink, appearing to read "Elicia B. Vega".

Elicia B. Vega
Assistant Secretary
EBV: dam
c: EPA Region VI

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

Sunshine Terminal
Agency Interest No.: 3492
LBC Baton Rouge, LLC
Sunshine, Iberville Parish, Louisiana

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	1.31	1.31	-
PM _{2.5}	1.31	1.31	-
SO ₂	0.09	0.09	-
NO _x	18.91	18.91	-
CO	61.26	61.26	-
VOC *	290.70	290.70	-
Sulfuric Acid	0.91	0.91	-

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

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
<u>Class I</u>			
Acrylonitrile	1.00	1.00	-
Benzene	23.40	23.40	-
Propylene oxide	79.57	79.57	-
<u>Class II</u>			
Ethyl benzene	180.50	180.50	-
Glycol ethers	19.77	19.77	-
Styrene	56.27	56.27	-
Xylene (mixed isomers)	96.91	96.91	-
<u>Class III</u>			
n-Butyl alcohol	25.43	25.43	-
Cumene	37.79	37.79	-
Ethylene glycol	10.78	10.78	-
n-Hexane	18.96	18.96	-
Methanol	16.60	16.60	-
Methyl ethyl ketone	19.07	19.07	-
Methyl isobutyl ketone	14.84	14.84	-
Toluene	36.89	36.89	-
Vinyl acetate	17.27	17.27	-

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

Sunshine Terminal
Agency Interest No.: 3492
LBC Baton Rouge, LLC
Sunshine, Iberville Parish, Louisiana

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

Pollutant	Before	After	Change
<u>Supplemental List</u>			
Benzyl chloride	45.50	45.50	-
Dimethyl formamide	19.56	19.56	-
Glycol ethers	19.71	19.71	-
Methyl tertiary butyl ether	13.90	13.90	-
Total ^a	290.70	290.70	-

^a Capped Emissions

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) does not apply.

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51 but exempt from its requirements, except those listed in LAC 33:III.5101.D. It is also a major source of hazardous air pollutants (HAPs).

Applicable requirements for equipment in benzene, gasoline, non-OLD, and OLD operations are listed in Common Requirement Groups (CRG) [tanks (CRG0020 – CRG0026), marine dock (CRG0030 – CRG0031), marine flare (CRG0032 – CRG0034), loading racks (CRG0040 – CRG0043), loading rack flares (CRG0044 – CRG0046), and fugitives (CRG0050 – CRG0051)].

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

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

LBC Baton Rouge LLC - Sunshine Terminal

Agency Interest No.: 3492

LBC Houston LP

Sunshine, Iberville Parish, Louisiana

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

ID No.:	Description	LAC 33:III.Chapter																					
		5 [▲]	509	9	11	13	15	2103	2104 [▲]	2107	2108	2111	2113	2123	2131	2133	2135	22	29 [▲]	51 [▲]	56	59 [▲]	
UNF0001	Sunshine Terminal			1	1	1							1			3	1 ^a		1	1		1	
EQT0001	1-80 – 700 HP Cleaver-Brooks Boiler				3	1	1											3					
EQT0002	Truck FL-1 – Truck Loading Flare				1	1	3																
EQT0003	Marine FL-2 – Marine Loading Flare				1	1	3																
EQT0004	Tank 10-1 – Fixed Roof Tank							3												3			
EQT0005	Tank 12-1 – Fixed Roof Tank							3												3			
EQT0006	Tank 12-2 – Fixed Roof Tank							3												3			
EQT0007	Tank 12-3 – Fixed Roof Tank							3												3			
EQT0009	Tank 15-1 – Fixed Roof Tank							3												3			
EQT0010	Tank 15-2 – Internal Floating Roof Tank			1				1									1 ^a						
EQT0011	Tank 150-1 – Fixed Roof Tank							3												3			
EQT0012	Tank 150-2 – Fixed Roof Tank							3												3			
EQT0013	2-80 – 700 HP Cleaver-Brooks Boiler				3	1	1											3					

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

LBC Baton Rouge LLC - Sunshine Terminal

Agency Interest No.: 3492

LBC Houston LP

Sunshine, Iberville Parish, Louisiana

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

ID No.:	Description	LAC 33:III.Chapter																					
		5 [▲]	509	9	11	13	15	2103	2104 [*]	2107	2108	2111	2113	2123	2131	2133	2135	22	29 [*]	51 [*]	56	59 [*]	
EQT0014	Tank 20-1 – Internal Floating Roof Tank			1				1									1 ^a						
EQT0015	Tank 25-1 – Fixed Roof Tank							3												3			
EQT0016	Tank 25-2 – Fixed Roof Tank							3												3			
EQT0018	Tank 55-1 – Fixed Roof Tank							3												3			
EQT0019	Tank 55-10 – Internal Floating Roof Tank			1				1									1 ^a						
EQT0020	Tank 55-11 – Internal Floating Roof Tank			1				1									1 ^a						
EQT0021	Tank 55-13 – Internal Floating Roof Tank			1				1									1 ^a						
EQT0022	Tank 55-2 – Fixed Roof Tank							1												3			
EQT0023	Tank 55-3 – Fixed Roof Tank							1												3			
EQT0024	Tank 55-4 – Internal Floating Roof Tank			1				1									1 ^a						
EQT0025	Tank 55-5 – Internal Floating Roof Tank			1				1									1 ^a						
EQT0026	Tank 55-6 – Internal Floating Roof Tank			1				1									1 ^a						
EQT0027	Tank 55-7 – Internal Floating Roof Tank			1				1									1 ^a						
EQT0028	Tank 55-8 – Internal Floating Roof Tank			1				1									1 ^a						
EQT0029	Tank 55-9 – Internal Floating Roof Tank			1				1									1 ^a						
EQT0033	Tank 80-3 – Fixed Roof Tank							3												3			

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

LBC Baton Rouge LLC - Sunshine Terminal

Agency Interest No.: 3492

LBC Houston LP

Sunshine, Iberville Parish, Louisiana

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

ID No.:	Description	LAC 33:III.Chapter																				
		5 [▲]	509	9	11	13	15	2103	2104 [*]	2107	2108	2111	2113	2123	2131	2133	2135	22	29 [*]	51 [*]	56	59 [*]
EQT0034	Tank 80-4 – Internal Floating Roof Tank							1									1 ^a					
EQT0035	Tank 80-5 – Internal Floating Roof Tank							1									1 ^a					
EQT0036	Tank 80-6 – Internal Floating Roof Tank			1				1									1 ^a			3		
EQT0037	Tank 80-7 – Internal Floating Roof Tank			1				1									1 ^a					
EQT0038	Tank 80-8 – Internal Floating Roof Tank			1				1									1 ^a					
EQT0039	Tank 80-9 – Internal Floating Roof Tank			1				1									1 ^a					
EQT0040	DOCK RACK– Marine Loading and Unloading Rack										1 ^b				3		1 ^a					
EQT0041	TRUCK RACK – Truck Loading and Unloading Rack									1 ^b					3		1 ^a					
EQT0042	RAIL FL-3 – Railcar Loading Flare				1	1	3															
EQT0043	500GT – Gasoline Storage Tank							1								2	1 ^a					
EQT0044	RAIL RACK – Railcar Loading and Unloading Rack									1 ^b					3							
EQT0047	Tank 120-1 – Internal Floating Roof Tank																1 ^a					
EQT0050	Tank 120-2 – Internal Floating Roof Tank																1 ^a					
EQT0053	Tank 50-1 – Fixed Roof Tank							1												3		

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

LBC Baton Rouge LLC - Sunshine Terminal

Agency Interest No.: 3492

LBC Houston LP

Sunshine, Iberville Parish, Louisiana

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

ID No.:	Description	LAC 33:III.Chapter																				
		5 ^A	509	9	11	13	15	2103	2104 [*]	2107	2108	2111	2113	2123	2131	2133	2135	22	29 [*]	51 [*]	56	59 [*]
EQT0054	Tank 100-1 – Fixed Roof Tank							1												3		
EQT0055	Tank 150-3 – Fixed Roof Tank							1												3		
EQT0056	Tank 150-4 – Fixed Roof Tank							1												3		
EQT0057	Tank 110-1 – Internal Floating Roof Tank							1									1 ^a					
EQT0058	Tank 110-2 – Internal Floating Roof Tank							1									1 ^a					
EQT0059	Tank 110-3 – Internal Floating Roof Tank							1									1 ^a					
EQT0060	Tank 110-4 – Internal Floating Roof Tank							1									1 ^a					
EQT0061	Tank 55-14 – Internal Floating Roof Tank							1									1 ^a					
EQT0062	Tank 55-15 – Internal Floating Roof Tank							1									1 ^a					
EQT0065	Tank 110-5 – Internal Floating Roof Tank							1									1 ^a					
EQT0067	Tank 80-10 – Internal Floating Roof Tank							1									1 ^a					
EQT0068	TK CLEAN – Tank Cleaning Emissions																					
EQT0071	Tank 80-1 – Internal Floating Roof Tank							1									1 ^a					
EQT0072	Tank 80-2 – Internal Floating Roof Tank							1									1 ^a					
EQT0073	TK DEGASSING – Tank Degassing Emissions																					

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

LBC Baton Rouge LLC - Sunshine Terminal

Agency Interest No.: 3492

LBC Houston LP

Sunshine, Iberville Parish, Louisiana

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

ID No.:	Description	LAC 33:III.Chapter																				
		5 [▲]	509	9	11	13	15	2103	2104 [*]	2107	2108	2111	2113	2123	2131	2133	2135	22	29 [*]	51 [*]	56	59 [*]
EQT0074	RAIL RACK – Railcar Loading and Unloading Rack									1 ^b					3							
EQT0075	Tank 55-16 Internal Floating Roof Storage Tank							1									1 ^a					
EQT0076	Tank 55-17 Internal Floating Roof Storage Tank							1									1 ^a					
FUG0012	FUG – Facility Fugitives																1 ^a					

^a When in gasoline operation^b When loading liquids with vapor pressure greater than or equal to 1.5 psia

* The regulations indicated above are State Only regulations.

▲ 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 changes 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

LBC Baton Rouge LLC - Sunshine Terminal

Agency Interest No.: 3492

LBC Houston LP

Sunshine, Iberville Parish, Louisiana

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

ID No.:	Description	40 CFR 60 NSPS										40 CFR 61					40 CFR 63 NESHAP							40 CFR		
		A	D	Db	Dc	K	Ka	Kb	XX	III		A	J	V	Y	BB	A	R	Y	SS	WW	EEEE	DDDD	52	64	68
UNF0001	Sunshine Terminal	1							1 ^a			1			1		1	1 ^a	1			1		3		1
EQT0001	1-80 – 700 HP Cleaver-Brooks Boiler		3	3	3																		1			
EQT0002	Truck FL-1 – Truck Loading Flare	1																	1	1		1			1	
EQT0003	Marine FL-2 – Marine Loading Flare	1													1		1 ^a	1	1			1			1	
EQT0004	Tank 10-1 – Fixed Roof Tank					1																3				
EQT0005	Tank 12-1 – 11' Fixed Roof Tank						1															3				
EQT0006	Tank 12-2 – Fixed Roof Tank						1															3				
EQT0007	Tank 12-3 – Fixed Roof Tank						1															3				
EQT0009	Tank 15-1 – Fixed Roof Tank					1																3				
EQT0010	Tank 15-2 – Internal Floating Roof Tank						1								1			1 ^a			1	1				
EQT0011	Tank 150-1 – Fixed Roof Tank							1														3				
EQT0012	Tank 150-2 – Fixed Roof Tank							1														3				
EQT0013	2-80 – 700 HP Cleaver-Brooks Boiler		3	3	3																1		1			
EQT0014	Tank 20-1 – Internal Floating Roof Tank					3	3	3							1			1 ^a			1	1				

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

LBC Baton Rouge LLC - Sunshine Terminal

Agency Interest No.: 3492

LBC Houston LP

Sunshine, Iberville Parish, Louisiana

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

ID No.:	Description	40 CFR 60 NSPS									40 CFR 61					40 CFR 63 NESHAP							40 CFR		
		A	D	Db	Dc	K	Ka	Kb	XX	III	A	J	V	Y	BB	A	R	Y	SS	WW	EEEE	DDDD	52	64	68
EQT0015	Tank 25-1 – Fixed Roof Tank					1															3				
EQT0016	Tank 25-2 – Fixed Roof Tank						1														3				
EQT0018	Tank 55-1 – Fixed Roof Tank					1															3				
EQT0019	Tank 55-10 – Internal Floating Roof Tank						1							1			1 ^a			1	1				
EQT0020	Tank 55-11 – Internal Floating Roof Tank						1							1			1 ^a			1	1				
EQT0021	Tank 55-13 – Internal Floating Roof Tank						1							1			1 ^a			1	1				
EQT0022	Tank 55-2 – Fixed Roof Tank					1															3				
EQT0023	Tank 55-3 – Fixed Roof Tank					1															3				
EQT0024	Tank 55-4 – Internal Floating Roof Tank						1							1			1 ^a			1	1				
EQT0025	Tank 55-5 – Internal Floating Roof Tank						1							1			1 ^a			1	1				
EQT0026	Tank 55-6 – Internal Floating Roof Tank						1							1			1 ^a			1	1				
EQT0027	Tank 55-7 – Internal Floating Roof Tank						1							1			1 ^a			1	1				
EQT0028	Tank 55-8 – Internal Floating Roof Tank						1							1			1 ^a			1	1				
EQT0029	Tank 55-9 – Internal Floating Roof Tank						1							1			1 ^a			1	1				
EQT0033	Tank 80-3 – Fixed Roof Tank						1														3				
EQT0034	Tank 80-4 – Internal Floating Roof Tank							1						1			1 ^a				1				

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

LBC Baton Rouge LLC - Sunshine Terminal

Agency Interest No.: 3492

LBC Houston LP

Sunshine, Iberville Parish, Louisiana

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

ID No.:	Description	40 CFR 60 NSPS									40 CFR 61					40 CFR 63 NESHAP							40 CFR		
		A	D	Db	Dc	K	Ka	Kb	XX	III	A	J	V	Y	BB	A	R	Y	SS	WW	EEEE	DDDD	52	64	68
EQT0035	Tank 80-5 – Internal Floating Roof Tank							1						1			1 ^a				1				
EQT0036	Tank 80-6 – Internal Floating Roof Tank						1							1			1 ^a			1	1				
EQT0037	Tank 80-7 – Internal Floating Roof Tank						1							1			1 ^a			1	1				
EQT0038	Tank 80-8 – Internal Floating Roof Tank						1							1			1 ^a			1	1				
EQT0039	Tank 80-9 – Internal Floating Roof Tank						1							1			1 ^a			1	1				
EQT0040	DOCK RACK– Marine Loading and Unloading Rack														1		1 ^a	1			1				
EQT0041	TRUCK RACK – Truck Loading and Unloading Rack								1 ^a						1		1 ^a				1				
EQT0042	RAIL FL-3 – Railcar Loading Flare	1							1						1		1 ^a				1			1	
EQT0043	500GT – Gasoline Storage Tank																								
EQT0044	RAIL RACK – Railcar Loading and Unloading Rack								1 ^a						1		1 ^a				1				
EQT0047	Tank 120-1 – Internal Floating Roof Tank							1						1			1 ^a			1	1				
EQT0050	Tank 120-2 – Internal Floating Roof Tank							1						1			1 ^a			1	1				
EQT0053	Tank 50-1 – Fixed Roof Tank							1													3				
EQT0054	Tank 100-1 – Fixed Roof Tank							1													3				
EQT0055	Tank 150-3 – Fixed Roof Tank							1													3				

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

LBC Baton Rouge LLC - Sunshine Terminal

Agency Interest No.: 3492

LBC Houston LP

Sunshine, Iberville Parish, Louisiana

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

ID No.:	Description	40 CFR 60 NSPS									40 CFR 61					40 CFR 63 NESHAP							40 CFR		
		A	D	Db	Dc	K	Ka	Kb	XX	III	A	J	V	Y	BB	A	R	Y	SS	WW	EEEE	DDDD	52	64	68
EQT0056	Tank 150-4 – Fixed Roof Tank							1													3				
EQT0057	Tank 110-1 – Internal Floating Roof Tank							1						1			1 ^a			1	1				
EQT0058	Tank 110-2 – Internal Floating Roof Tank							1						1			1 ^a			1	1				
EQT0059	Tank 110-3 – Internal Floating Roof Tank							1						1			1 ^a			1	1				
EQT0060	Tank 110-4 – Internal Floating Roof Tank							1						1			1 ^a			1	1				
EQT0061	Tank 55-14 – Internal Floating Roof Tank							1						1			1 ^a			1	1				
EQT0062	Tank 55-15 – Internal Floating Roof Tank							1						1			1 ^a			1	1				
EQT0065	Tank 110-5 – Internal Floating Roof Tank							1						1			1 ^a			1	1				
EQT0067	Tank 80-10 – Internal Floating Roof Tank							1						1			1 ^a			1	1				
EQT0068	TK CLEAN – Tank Cleaning Emissions																								
EQT0071	Tank 80-1 – Internal Floating Roof Tank							1						1			1 ^a			1	1				
EQT0072	Tank 80-2 – Internal Floating Roof Tank							1						1			1 ^a			1	1				
EQT0073	TK DEGASSING – Tank Degassing Emissions																								
EQT0074	RAIL RACK – Railcar Loading and Unloading Rack								1 ^a						1		1 ^a				1				
EQT0075	Tank 55-16 Internal Floating Roof Storage Tank							1						1			1 ^a				1				

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

LBC Baton Rouge LLC - Sunshine Terminal

Agency Interest No.: 3492

LBC Houston LP

Sunshine, Iberville Parish, Louisiana

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

ID No.:	Description	40 CFR 60 NSPS									40 CFR 61					40 CFR 63 NESHAP							40 CFR		
		A	D	Db	Dc	K	Ka	Kb	XX	III	A	J	V	Y	BB	A	R	Y	SS	WW	EEEE	DDDDD	52	64	68
EQT0076	Tank 55-17 Internal Floating Roof Storage Tank							1						1			1 ^a				1				
FUG0012	FUG – Facility Fugitives											1	1				1 ^a				1				

^a When in gasoline operation**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.
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- Blank – The regulations clearly do not apply to this type of emission source.

INVENTORIES**AI ID: 3492 - LBC Baton Rouge LLC - Sunshine Terminal****Activity Number: PER20180002****Permit Number: 1280-00025-V9****Air - Title V Regular Permit Minor Mod****Subject Item Inventory:**

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Sunshine Terminal						
EQT 0001	1-80 - 700 HP Cleaver-Brooks Boiler		29.3 MM BTU/hr	29.3 MM BTU/hr	Back up for boiler 2-80	8760 hr/yr
EQT 0002	FL-1 - Truck Loading Flare			48.1 MM scf/yr		8760 hr/yr
EQT 0003	MARINE FL-2 - Marine Loading Flare			120.3 MM scf/yr		8760 hr/yr
EQT 0004	10-1 - Tank 10-1 - VFRK	420000 gallons		150000 bbl/yr		8760 hr/yr
EQT 0005	12-1 - Tank 12-1 - VFRKa	504000 gallons		180000 bbl/yr		8760 hr/yr
EQT 0006	12-2 - Tank 12-2 - VFRKa	12000 bbl		180000 bbl/yr		8760 hr/yr
EQT 0007	12-3 - Tank 12-3 - VFRKa	12000 bbl		180000 bbl/yr		8760 hr/yr
EQT 0009	15-1 - Tank 15-1 - VFRK	15000 bbl		225000 bbl/yr		8760 hr/yr
EQT 0010	15-2 - Tank 15-2 - IFRKa	15000 bbl	360000 bbl/yr	225000 bbl/yr		8760 hr/yr
EQT 0011	150-1 - Tank 150-1 - VFRK	150000 bbl	7.2 MM bbl/yr	2.25 MM bbl/yr		8760 hr/yr
EQT 0012	150-2 - Tank 150-2 - VFRK	150000 bbl	7.2 MM bbl/yr	2.25 MM bbl/yr		8760 hr/yr
EQT 0013	2-80 - 700 HP Cleaver-Brooks Boiler		29.3 MM BTU/hr	29.3 MM BTU/hr	Back up for boiler 1-80	8760 hr/yr
EQT 0014	20-1 - Tank 20-1 - IFRG	20000 bbl	480000 bbl/yr	300000 bbl/yr		8760 hr/yr
EQT 0015	25-1 - Tank 25-1 - VFRKa	25000 bbl		375000 bbl/yr		8760 hr/yr
EQT 0016	25-2 - Tank 25-2 - VFRKa	25000 bbl		375000 bbl/yr		8760 hr/yr
EQT 0018	55-1 - Tank 55-1 - VFRK	55000 bbl		825000 bbl/yr		8760 hr/yr
EQT 0019	55-10 - Tank 55-10 - IFRKa	55000 bbl		825000 bbl/yr		8760 hr/yr
EQT 0020	55-11 - Tank 55-11 - IFRKa	55000 bbl		825000 bbl/yr		8760 hr/yr
EQT 0021	55-13 - Tank 55-13 - IFRKa	55000 bbl		825000 bbl/yr		8760 hr/yr
EQT 0022	55-2 - Tank 55-2 - VFRK	55000 bbl		825000 bbl/yr		8760 hr/yr
EQT 0023	55-3 - Tank 55-3 - VFRK	55000 bbl		825000 bbl/yr		8760 hr/yr
EQT 0024	55-4 - Tank 55-4 - IFRKa	55000 bbl		825000 bbl/yr		8760 hr/yr
EQT 0025	55-5 - Tank 55-5 - IFRKa	55000 bbl		825000 bbl/yr		8760 hr/yr
EQT 0026	55-6 - Tank 55-6 - IFRKa	55000 bbl		825000 bbl/yr		8760 hr/yr
EQT 0027	55-7 - Tank 55-7 - IFRKa	55000 bbl		825000 bbl/yr		8760 hr/yr
EQT 0028	55-8 - Tank 55-8 - IFRKa	55000 bbl		825000 bbl/yr		8760 hr/yr
EQT 0029	55-9 - Tank 55-9 - IFRKa	55000 bbl		825000 bbl/yr		8760 hr/yr
EQT 0033	80-3 - Tank 80-3 - VFRKa	80000 bbl		1.2 MM bbl/yr		8760 hr/yr
EQT 0034	80-4 - Tank 80-4 - IFRKb	80000 bbl	1.92 MM bbl/yr	1.92 MM bbl/yr		8760 hr/yr
EQT 0035	80-5 - Tank 80-5 - IFRKb	80000 bbl	1.92 MM bbl/yr	1.92 MM bbl/yr		8760 hr/yr
EQT 0036	80-6 - Tank 80-6 - IFRKa	80000 bbl		1.2 MM bbl/yr		8760 hr/yr
EQT 0037	80-7 - Tank 80-7 - IFRKa	80000 bbl		1.2 MM bbl/yr		8760 hr/yr
EQT 0038	80-8 - Tank 80-8 - IFRKa	80000 bbl		1.2 MM bbl/yr		8760 hr/yr
EQT 0039	80-9 - Tank 80-9 - IFRKa	80000 bbl		1.2 MM bbl/yr		8760 hr/yr
EQT 0040	MARINE RACK - Marine Loading and Unloading Dock			5200 bbl/hr		8760 hr/yr
EQT 0041	TRUCK RACK - Truck Loading Rack			700 gallons/min		8760 hr/yr
EQT 0042	RAIL FL-3 - Railcar Loading Flare		8.64 BTU/hr	7560 gallons/min		8760 hr/yr
EQT 0043	500GT - Gasoline Storage Tank	500 gallons	47472 gallons/yr	47472 gallons/yr	Gasoline	8760 hr/yr
EQT 0044	RAIL RACK - Railcar Loading and Unloading Rack			7560 gallons/min		8760 hr/yr

INVENTORIES**AI ID: 3492 - LBC Baton Rouge LLC - Sunshine Terminal****Activity Number: PER20180002****Permit Number: 1280-00025-V9****Air - Title V Regular Permit Minor Mod****Subject Item Inventory:**

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Sunshine Terminal						
EQT 0047	120-1 - Tank 120-1 - IFRKb	120000 bbl		1800000 bbl/yr		8760 hr/yr
EQT 0050	120-2 - Tank 120-2 - IFRKb	120000 bbl		1800000 bbl/yr		8760 hr/yr
EQT 0053	50-1 - Tank 50-1 - VFRKb	50000 bbl		750000 bbl/yr		8760 hr/yr
EQT 0054	100-1 - Tank 100-1 - VFRKb	100000 bbl		1500000 bbl/yr		8760 hr/yr
EQT 0055	150-3 - Tank 150-3 - VFRKb	150000 bbl	7.2 MM bbl/yr	2.25 MM bbl/yr		8760 hr/yr
EQT 0056	150-4 - Tank 150-4 - VFRKb	150000 bbl	7.2 MM bbl/yr	2.25 MM bbl/yr		8760 hr/yr
EQT 0057	110-1 - Tank 110-1 - IFRKb	110000 bbl		1650000 bbl/yr		8760 hr/yr
EQT 0058	110-2 - Tank 110-2 - IFRKb	110000 bbl		1650000 bbl/yr		8760 hr/yr
EQT 0059	110-3 - Tank 110-3 - IFRKb	110000 bbl		1650000 bbl/yr		8760 hr/yr
EQT 0060	110-4 - Tank 110-4 - IFRKb	110000 bbl		1650000 bbl/yr		8760 hr/yr
EQT 0061	55-14 - Tank 55-14 - IFRKb	55000 bbl	1320000 bbl/yr	1320000 bbl/yr		8760 hr/yr
EQT 0062	55-15 - Tank 55-15 - IFRKb	55000 bbl	1320000 bbl/yr	1320000 bbl/yr		8760 hr/yr
EQT 0065	110-5 - Tank 110-5 - IFRKb	110000 bbl	1.32 MM bbl/yr	1.32 MM bbl/yr		8760 hr/yr
EQT 0067	80-10 - Tank 80-10 - IFRKb	80000 bbl		960000 bbl/yr		8760 hr/yr
EQT 0068	TK CLEAN - Tank Cleaning Emissions					8760 hr/yr
EQT 0071	80-1 - Tank 80-1 - IFRKb	80000 bbl	960000 bbl/yr	960000 bbl/yr		8760 hr/yr
EQT 0072	80-2 - Tank 80-2 - IFRKb	80000 bbl	960000 bbl/yr	960000 bbl/yr		8760 hr/yr
EQT 0073	TK DEGASSING - Tank Degassing Emissions					8760 hr/yr
EQT 0074	RAIL RACK - Railcar Loading and Unloading Rack			7560 gallons/min		8760 hr/yr
EQT 0075	TANK 55-16 - Internal Floating Roof Storage Tank	55000 bbl	1.32 MM bbl/yr	1.32 MM bbl/yr		8760 hr/yr
EQT 0076	TANK 55-17 - Internal Floating Roof Storage Tank	55000 bbl	1.32 MM bbl/yr	1.32 MM bbl/yr		8760 hr/yr
FUG 0012	FUG - Facility-Wide Fugitives					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)
Sunshine Terminal							
EQT 0001	1-80 - 700 HP Cleaver-Brooks Boiler	35.9	10771	2		28.5	300
EQT 0002	FL-1 - Truck Loading Flare	27.7	320	.5		25	1832
EQT 0003	MARINE FL-2 - Marine Loading Flare	5.4	10782	6.5		50	1500
EQT 0004	10-1 - Tank 10-1 - VFRK			.66		35	77
EQT 0005	12-1 - Tank 12-1 - VFRKa			.66		40	77
EQT 0006	12-2 - Tank 12-2 - VFRKa			.66		40	77
EQT 0007	12-3 - Tank 12-3 - VFRKa			.66		40	77
EQT 0009	15-1 - Tank 15-1 - VFRK			.66		40	77
EQT 0010	15-2 - Tank 15-2 - IFRKa			.25		40	77

INVENTORIES**AI ID: 3492 - LBC Baton Rouge LLC - Sunshine Terminal****Activity Number: PER20180002****Permit Number: 1280-00025-V9****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)
Sunshine Terminal							
EQT 0011	150-1 - Tank 150-1 - VFRK			1		48	77
EQT 0012	150-2 - Tank 150-2 - VFRK			1		48	77
EQT 0013	2-80 - 700 HP Cleaver-Brooks Boiler	35.9	10771	2		28.5	300
EQT 0014	20-1 - Tank 20-1 - IFRG			.25		40	77
EQT 0015	25-1 - Tank 25-1 - VFRKa			.66		40	77
EQT 0016	25-2 - Tank 25-2 - VFRKa			.66		40	77
EQT 0018	55-1 - Tank 55-1 - VFRK			.66		40	77
EQT 0019	55-10 - Tank 55-10 - IFRKa			.66		40	77
EQT 0020	55-11 - Tank 55-11 - IFRKa			.66		40	77
EQT 0021	55-13 - Tank 55-13 - IFRKa			.66		40	77
EQT 0022	55-2 - Tank 55-2 - VFRK	.1	180	3		46	77
EQT 0023	55-3 - Tank 55-3 - VFRK			.66		40	77
EQT 0024	55-4 - Tank 55-4 - IFRKa			.66		40	77
EQT 0025	55-5 - Tank 55-5 - IFRKa			.66		40	77
EQT 0026	55-6 - Tank 55-6 - IFRKa			.66		40	77
EQT 0027	55-7 - Tank 55-7 - IFRKa			.66		40	77
EQT 0028	55-8 - Tank 55-8 - IFRKa			.66		40	77
EQT 0029	55-9 - Tank 55-9 - IFRKa			.66		40	77
EQT 0033	80-3 - Tank 80-3 - VFRKa			.66		40	77
EQT 0034	80-4 - Tank 80-4 - IFRKb			.25		46	77
EQT 0035	80-5 - Tank 80-5 - IFRKb			.25		46	77
EQT 0036	80-6 - Tank 80-6 - IFRKa			.66		40	77
EQT 0037	80-7 - Tank 80-7 - IFRKa			.66		40	77
EQT 0038	80-8 - Tank 80-8 - IFRKa			.66		40	77
EQT 0039	80-9 - Tank 80-9 - IFRKa			.66		40	77
EQT 0040	MARINE RACK - Marine Loading and Unloading Dock	.49	234	3.2		6.6	77
EQT 0041	TRUCK RACK - Truck Loading Rack	.22	94	3		12	77
EQT 0042	RAIL FL-3 - Railcar Loading Flare	38.3	801	.67		40	1832
EQT 0043	500GT - Gasoline Storage Tank	3	180	.25		6.25	75
EQT 0044	RAIL RACK - Railcar Loading and Unloading Rack	.6	94	3		12	77
EQT 0047	120-1 - Tank 120-1 - IFRKb			.83		40	77
EQT 0050	120-2 - Tank 120-2 - IFRKb			.83		40	77

INVENTORIES**AI ID: 3492 - LBC Baton Rouge LLC - Sunshine Terminal****Activity Number: PER20180002****Permit Number: 1280-00025-V9****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)
Sunshine Terminal							
EQT 0053	50-1 - Tank 50-1 - VFRKb			.83		40	77
EQT 0054	100-1 - Tank 100-1 - VFRKb			.83		40	77
EQT 0055	150-3 - Tank 150-3 - VFRKb			.83		40	77
EQT 0056	150-4 - Tank 150-4 - VFRKb			.83		40	77
EQT 0057	110-1 - Tank 110-1 - IFRKb			.83		40	77
EQT 0058	110-2 - Tank 110-2 - IFRKb			.83		40	77
EQT 0059	110-3 - Tank 110-3 - IFRKb			.83		40	77
EQT 0060	110-4 - Tank 110-4 - IFRKb			.83		40	77
EQT 0061	55-14 - Tank 55-14 - IFRKb			.25		40	77
EQT 0062	55-15 - Tank 55-15 - IFRKb			.25		40	77
EQT 0065	110-5 - Tank 110-5 - IFRKb			.83		40	77
EQT 0067	80-10 - Tank 80-10 - IFRKb			.66		40	77
EQT 0071	80-1 - Tank 80-1 - IFRKb			.66		40	77
EQT 0072	80-2 - Tank 80-2 - IFRKb			.66		40	77
EQT 0074	RAIL RACK - Railcar Loading and Unloading Rack	.6	94	3		12	77
EQT 0075	TANK 55-16 - Internal Floating Roof Storage Tank			.25		40	77
EQT 0076	TANK 55-17 - Internal Floating Roof Storage Tank			.25		40	77

Relationships:

ID	Description	Relationship	ID	Description
EQT 0002	FL-1 - Truck Loading Flare	Controls emissions from, when in OLD operation, loading odorous liquids, or loading Non-OLD liquids with vapor pressure ≥ 1.5 psia	EQT 0041	TRUCK RACK - Truck Loading Rack
EQT 0003	MARINE FL-2 - Marine Loading Flare	Controls emissions from, when in OLD operation, loading liquids, or loading Non-OLD liquids with vapor pressure ≥ 1.5 psia	EQT 0040	MARINE RACK - Marine Loading and Unloading Dock
EQT 0042	RAIL FL-3 - Railcar Loading Flare	Controls emissions from, when in OLD operation, loading odorous liquids, or loading Non-OLD liquids with vapor pressure ≥ 1.5 psia	EQT 0044	RAIL RACK - Railcar Loading and Unloading Rack
EQT 0042	RAIL FL-3 - Railcar Loading Flare	Controls emissions from, when in OLD operation, loading odorous liquids, or loading Non-OLD liquids with vapor pressure ≥ 1.5 psia	EQT 0041	TRUCK RACK - Truck Loading Rack
EQT 0042	RAIL FL-3 - Railcar Loading Flare	Controls emissions from, when in OLD operation, loading odorous	EQT 0074	RAIL RACK - Railcar Loading and Unloading Rack

INVENTORIES**AI ID: 3492 - LBC Baton Rouge LLC - Sunshine Terminal****Activity Number: PER20180002****Permit Number: 1280-00025-V9****Air - Title V Regular Permit Minor Mod****Relationships:**

ID	Description	Relationship	ID	Description
		liquids, or loadin Non-OLD liquids with vapor pressure >=1.5 psia		

Subject Item Groups:

ID	Group Type	Group Description
CRG 0020	Common Requirements Group	K-NO-OLD - Common Requirements for Subpart K Tanks in Non-OLD Operation and 1.0 psia <= VP < 1.5 psia
CRG 0021	Common Requirements Group	Ka-NO-OLD-LO - Common Requirements for Subpart Ka Tanks in Non-OLD Operation and 1.0 psia <= VP < 1.5 psia
CRG 0022	Common Requirements Group	Kb-NO-OLD-LO - Common Requirements for Subpart Kb Tanks in Non-OLD Operation and 0.5 psia <= VP < 0.75 psia
CRG 0023	Common Requirements Group	Ka-NO-OLD-HI - Common Requirements for Subpart Ka Tanks in Non-OLD Operation and 1.5 psia <= VP < 11.1 psia
CRG 0024	Common Requirements Group	Kb-NO-OLD-HI - Common Requirements for Subpart Kb Tanks in Non-OLD Operation and 0.75 psia <= VP < 11.1 psia
CRG 0025	Common Requirements Group	Kb-GAS - Common Requirements for Subpart Kb Tanks in Gasoline Operation
CRG 0026	Common Requirements Group	IFR-OLD - Common Requirements for IFR Tanks in OLD Operations
CRG 0030	Common Requirements Group	MDOCK-BZ - Common Requirements for Marine Dock Loading/Unloading Benzene
CRG 0031	Common Requirements Group	MDOCK-NOBZ - Common Requirements for Marine Dock Loading/Unloading Other than Benzene with VP => 1.5 psia
CRG 0032	Common Requirements Group	MFLARE-BZ - Common Requirements for Marine Dock Flare - Loading/Unloading Benzene
CRG 0033	Common Requirements Group	MFLARE-NOBZ - Common Requirements for Marine Dock Flare - Loading/Unloading Other than Benzene, VP => 1.5 psia
CRG 0034	Common Requirements Group	MFLARE-GAS - Common Requirements for Marine Dock Flare - Loading/Unloading Gasoline
CRG 0040	Common Requirements Group	RACK-BZ - Common Requirements for Tank Truck / Railcar Rack Loading/Unloading Benzene
CRG 0041	Common Requirements Group	RACK-OLD - Common Requirements for Tank Truck / Railcar Rack Loading/Unloading OLD Liquids
CRG 0042	Common Requirements Group	RACK-GAS - Common Requirements for Tank Truck / Railcar Rack Loading/Unloading Gasoline
CRG 0043	Common Requirements Group	RACK-NO-OLD - Common Requirements for Tank Truck / Railcar Rack Loading/Unloading Non-OLD Liquids with VP => 1.5 psia
CRG 0044	Common Requirements Group	RFLARE - Common Requirements for Flare Controlling Tank Truck / Railcar Loading/Unloading Benzene
CRG 0045	Common Requirements Group	RFLARE-OLD - Common Requirements for Flare Controlling Tank Truck / Railcar Loading/Unloading OLD Liquids
CRG 0046	Common Requirements Group	RFLARE-GAS - Common Requirements for Flare Controlling Tank Truck / Railcar Loading/Unloading Gasoline
CRG 0050	Common Requirements Group	FUG-BZ - Common Requirements for Fugitive Components in Benzene Service
CRG 0051	Common Requirements Group	FUG-GAS - Common Requirements for Fugitive Components in Gasoline Service
GRP 0007	Equipment Group	BOILERS - Boilers Cap and Requirements(1-80 & 2-80)
GRP 0024	Equipment Group	Tanks - Tanks, Tank Trucks, Loading Operations, and Flare
UNF 0001	Unit or Facility Wide	AI-3492 - Sunshine Terminal

Group Membership:

ID	Description	Member of Groups
EQT 0001	1-80 - 700 HP Cleaver-Brooks Boiler	GRP0000000007
EQT 0002	FL-1 - Truck Loading Flare	CRG00000000044, CRG00000000045, CRG00000000046, GRP00000000024
EQT 0003	MARINE FL-2 - Marine Loading Flare	CRG00000000032, CRG00000000033, CRG00000000034, GRP00000000024
EQT 0004	10-1 - Tank 10-1 - VFRK	CRG00000000020, GRP00000000024

INVENTORIES**AI ID: 3492 - LBC Baton Rouge LLC - Sunshine Terminal****Activity Number: PER20180002****Permit Number: 1280-00025-V9****Air - Title V Regular Permit Minor Mod****Group Membership:**

ID	Description	Member of Groups
EQT 0005	12-1 - Tank 12-1 - VFRKa	CRG0000000021, GRP0000000024
EQT 0006	12-2 - Tank 12-2 - VFRKa	CRG0000000021, GRP0000000024
EQT 0007	12-3 - Tank 12-3 - VFRKa	CRG0000000021, GRP0000000024
EQT 0009	15-1 - Tank 15-1 - VFRK	CRG0000000020, GRP0000000024
EQT 0010	15-2 - Tank 15-2 - IFRKa	CRG0000000021, CRG0000000023, CRG0000000025, CRG0000000026, GRP0000000024
EQT 0011	150-1 - Tank 150-1 - VFRK	CRG0000000020, GRP0000000024
EQT 0012	150-2 - Tank 150-2 - VFRK	CRG0000000020, GRP0000000024
EQT 0013	2-80 - 700 HP Cleaver-Brooks Boiler	GRP0000000007
EQT 0014	20-1 - Tank 20-1 - IFRG	CRG0000000020, CRG0000000023, GRP0000000024
EQT 0015	25-1 - Tank 25-1 - VFRKa	CRG0000000020, GRP0000000024
EQT 0016	25-2 - Tank 25-2 - VFRKa	CRG0000000021, GRP0000000024
EQT 0018	55-1 - Tank 55-1 - VFRK	CRG0000000020, GRP0000000024
EQT 0019	55-10 - Tank 55-10 - IFRKa	CRG0000000021, CRG0000000023, CRG0000000025, CRG0000000026, GRP0000000024
EQT 0020	55-11 - Tank 55-11 - IFRKa	CRG0000000021, CRG0000000023, CRG0000000025, CRG0000000026, GRP0000000024
EQT 0021	55-13 - Tank 55-13 - IFRKa	CRG0000000021, CRG0000000023, CRG0000000025, CRG0000000026, GRP0000000024
EQT 0022	55-2 - Tank 55-2 - VFRK	CRG0000000020, GRP0000000024
EQT 0023	55-3 - Tank 55-3 - VFRK	CRG0000000020, GRP0000000024
EQT 0024	55-4 - Tank 55-4 - IFRKa	CRG0000000021, CRG0000000023, CRG0000000025, CRG0000000026, GRP0000000024
EQT 0025	55-5 - Tank 55-5 - IFRKa	CRG0000000021, CRG0000000023, CRG0000000025, CRG0000000026, GRP0000000024
EQT 0026	55-6 - Tank 55-6 - IFRKa	CRG0000000021, CRG0000000023, CRG0000000025, CRG0000000026, GRP0000000024
EQT 0027	55-7 - Tank 55-7 - IFRKa	CRG0000000021, CRG0000000023, CRG0000000025, CRG0000000026, GRP0000000024
EQT 0028	55-8 - Tank 55-8 - IFRKa	CRG0000000021, CRG0000000023, CRG0000000025, CRG0000000026, GRP0000000024
EQT 0029	55-9 - Tank 55-9 - IFRKa	CRG0000000021, CRG0000000023, CRG0000000025, CRG0000000026, GRP0000000024
EQT 0033	80-3 - Tank 80-3 - VFRKa	CRG0000000021, GRP0000000024
EQT 0034	80-4 - Tank 80-4 - IFRKb	CRG0000000022, CRG0000000024, CRG0000000026, GRP0000000024
EQT 0035	80-5 - Tank 80-5 - IFRKb	CRG0000000021, CRG0000000023, CRG0000000025, CRG0000000026, GRP0000000024
EQT 0036	80-6 - Tank 80-6 - IFRKa	CRG0000000021, CRG0000000023, CRG0000000025, CRG0000000026, GRP0000000024
EQT 0037	80-7 - Tank 80-7 - IFRKa	CRG0000000021, CRG0000000023, CRG0000000025, CRG0000000026, GRP0000000024
EQT 0038	80-8 - Tank 80-8 - IFRKa	CRG0000000021, CRG0000000023, CRG0000000025, CRG0000000026, GRP0000000024
EQT 0039	80-9 - Tank 80-9 - IFRKa	CRG0000000021, CRG0000000023, CRG0000000025, CRG0000000026, GRP0000000024
EQT 0040	MARINE RACK - Marine Loading and Unloading Dock	CRG0000000030, CRG0000000031, GRP0000000024

INVENTORIES**AI ID: 3492 - LBC Baton Rouge LLC - Sunshine Terminal****Activity Number: PER20180002****Permit Number: 1280-00025-V9****Air - Title V Regular Permit Minor Mod****Group Membership:**

ID	Description	Member of Groups
EQT 0041	TRUCK RACK - Truck Loading Rack	CRG0000000040, CRG0000000041, CRG0000000042, CRG0000000043, GRP0000000024
EQT 0042	RAIL FL-3 - Railcar Loading Flare	CRG0000000044, CRG0000000045, CRG0000000046, GRP0000000024
EQT 0043	500GT - Gasoline Storage Tank	GRP0000000024
EQT 0044	RAIL RACK - Railcar Loading and Unloading Rack	CRG0000000040, CRG0000000041, CRG0000000042, CRG0000000043, GRP0000000024
EQT 0047	120-1 - Tank 120-1 - IFRKb	CRG0000000022, CRG0000000024, CRG0000000026, GRP0000000024
EQT 0050	120-2 - Tank 120-2 - IFRKb	CRG0000000022, CRG0000000024, CRG0000000026, GRP0000000024
EQT 0053	50-1 - Tank 50-1 - VFRKb	CRG0000000022, GRP0000000024
EQT 0054	100-1 - Tank 100-1 - VFRKb	CRG0000000022, GRP0000000024
EQT 0055	150-3 - Tank 150-3 - VFRKb	CRG0000000022, GRP0000000024
EQT 0056	150-4 - Tank 150-4 - VFRKb	CRG0000000022, GRP0000000024
EQT 0057	110-1 - Tank 110-1 - IFRKb	CRG0000000022, CRG0000000024, CRG0000000026, GRP0000000024
EQT 0058	110-2 - Tank 110-2 - IFRKb	CRG0000000022, CRG0000000024, CRG0000000026, GRP0000000024
EQT 0059	110-3 - Tank 110-3 - IFRKb	CRG0000000022, CRG0000000024, CRG0000000026, GRP0000000024
EQT 0060	110-4 - Tank 110-4 - IFRKb	CRG0000000022, CRG0000000024, CRG0000000026, GRP0000000024
EQT 0061	55-14 - Tank 55-14 - IFRKb	CRG0000000022, CRG0000000024, CRG0000000026, GRP0000000024
EQT 0062	55-15 - Tank 55-15 - IFRKb	CRG0000000022, CRG0000000024, CRG0000000026, GRP0000000024
EQT 0065	110-5 - Tank 110-5 - IFRKb	CRG0000000022, CRG0000000024, CRG0000000026, GRP0000000024
EQT 0067	80-10 - Tank 80-10 - IFRKb	CRG0000000022, CRG0000000024, CRG0000000026, GRP0000000024
EQT 0068	TK CLEAN - Tank Cleaning Emissions	GRP0000000024
EQT 0071	80-1 - Tank 80-1 - IFRKb	CRG0000000024, CRG0000000026, GRP0000000024
EQT 0072	80-2 - Tank 80-2 - IFRKb	CRG0000000024, CRG0000000026, GRP0000000024
EQT 0073	TK DEGASSING - Tank Degassing Emissions	GRP0000000024
EQT 0074	RAIL RACK - Railcar Loading and Unloading Rack	CRG0000000040, CRG0000000041, CRG0000000042, CRG0000000043, GRP0000000024
EQT 0075	TANK 55-16 - Internal Floating Roof Storage Tank	CRG0000000024, CRG0000000026, GRP0000000024
EQT 0076	TANK 55-17 - Internal Floating Roof Storage Tank	CRG0000000024, CRG0000000026, GRP0000000024
FUG 0012	FUG - Facility-Wide Fugitives	CRG0000000050, CRG0000000051, GRP0000000024

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 3492
4226	Special warehousing and storage, nec	UNF 001

SPECIFIC REQUIREMENTS

AI ID: 3492 - LBC Baton Rouge LLC - Sunshine Terminal

Activity Number: PER20180002

Permit Number: 1280-00025-V9

Air - Title V Regular Permit Minor Mod

GRP 0007 BOILERS - Boilers Cap and Requirements(1-80 & 2-80)

- 538 [LAC 33:III.507.H.1.a] Operating time recordkeeping by electronic or hard copy monthly. Keep records of the total hours of operation for each boiler each month, as well as the total combined hours of operation for the last twelve months. Make records available for inspection by DEQ personnel.
- 539 [LAC 33:III.507.H.1.a] Submit report: Due annually, by the 30th of April. Report the hours of operation for each boiler, as well as the combined total hours of operation for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division.

GRP 0024 Tanks - Tanks, Tank Trucks, Loading Operations, and Flare

Group Members: EQT 0002 EQT 0003 EQT 0004 EQT 0005 EQT 0006 EQT 0007 EQT 0009 EQT 0010 EQT 0011 EQT 0012 EQT 0014 EQT 0015 EQT 0016 EQT 0018 EQT 0019 EQT 0020 EQT 0021 EQT 0022 EQT 0023 EQT 0024 EQT 0025 EQT 0026 EQT 0027 EQT 0028 EQT 0029 EQT 0033 EQT 0034 EQT 0035 EQT 0036 EQT 0037 EQT 0038 EQT 0039 EQT 0040 EQT 0041 EQT 0042 EQT 0043 EQT 0044 EQT 0047 EQT 0050 EQT 0053 EQT 0054 EQT 0055 EQT 0056 EQT 0057 EQT 0058 EQT 0059 EQT 0060 EQT 0061 EQT 0062 EQT 0065 EQT 0067 EQT 0068 EQT 0071 EQT 0072 EQT 0073 EQT 0074 EQT 0075 EQT 0076 FUG 0012

- 540 [LAC 33:III.501.C.6] Storing of any material containing a TAP listed in Table 51.1, 51.2, or 51.3 of LAC 33:III.Chapter 51 is permitted. Emissions of any TAP listed under this cap (in the emission rates for TAP/HAP and other pollutants section of this permit) shall be limited to the amount stated. Emissions of any TAP not listed under this cap shall be limited to an amount less than the Minimum Emission Rate (MER) for that TAP as listed in Tables 51.1 and 51.2 of LAC 33:III.5112. Emissions of any TAP not listed under this cap in an amount greater than or equal to the MER shall require a permit modification prior to use. Permittee may emit any TAP listed in Table 51.3 of LAC 33:III.5112 at any rate so long as the facility-wide total emission of TAP remains below 290.70 tons/yr.
- 541 [LAC 33:III.507.H.1.a] Shall demonstrate compliance with the emission limit (290.70 TPY VOC/TAPs) for the Tank Emission Cap by recording the chemicals stored and throughput to the tanks under this 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/TAP emissions from all emission units under this emission cap over the maximum given in this permit 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.

UNF 0001 AI-3492 - Sunshine Terminal

- 542 [40 CFR 60.] All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.
- 543 [40 CFR 61.] All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart A.
- 544 [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)]
- 545 [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)]
- 546 [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)]

SPECIFIC REQUIREMENTS**AI ID: 3492 - LBC Baton Rouge LLC - Sunshine Terminal****Activity Number: PER20180002****Permit Number: 1280-00025-V9****Air - Title V Regular Permit Minor Mod****UNF 0001 AI-3492 - Sunshine Terminal**

- 547 [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)]
- 548 [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)]
- 549 [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)]
- 550 [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)]
- 551 [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)]
- 552 [40 CFR 63.428(g)] Include the information specified in 40 CFR 63.428(g)(1) through (g)(3), as applicable, in a semiannual report to DEQ. Subpart R. [40 CFR 63.428(g)]
- 553 [40 CFR 63.428(h)] Include in the excess emissions report to DEQ required in accordance with 40 CFR 63.10(e)(3), whether or not a CMS is installed at the facility. Include the information specified in 40 CFR 63.428(h)(1) through (h)(4), as applicable. Subpart R. [40 CFR 63.428(h)]
- 554 [40 CFR 63.] All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A as delineated in Table 1 of 40 CFR 63 Subpart R and Table 12 of 40 CFR 63 Subpart EEEE. .
- 555 [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.
- 556 [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 intensifies an existing traffic hazard condition are prohibited.
- 557 [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.
- 558 [LAC 33:III.2103] 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.
- 559 [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.
- 560 [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.
- 561 [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.
- 562 [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.

SPECIFIC REQUIREMENTS**AI ID: 3492 - LBC Baton Rouge LLC - Sunshine Terminal****Activity Number: PER20180002****Permit Number: 1280-00025-V9****Air - Title V Regular Permit Minor Mod****UNF 0001 AI-3492 - Sunshine Terminal**

- 563 [LAC 33:III.5105.A.2] Do not cause a violation of any ambient air standard listed in LAC 33:III.5112, Table 51.2, unless operating in accordance with LAC 33:III.5109.B.
- 564 [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.
- 565 [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]
- 566 [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.
- 567 [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.
- 568 [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.
- 569 [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.
- 570 [LAC 33:III.5901.A] Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.
- 571 [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 59.1 of 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.
- 572 [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 Office of Environmental Compliance.
- 573 [LAC 33:III.5911.C] Submit amended registration: Due to the Office of Environmental Compliance within 60 days after the information in the submitted registration is no longer accurate.
- 574 [LAC 33:III.919] Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 30th of April to the Office of Environmental Services, for the reporting period of the previous calendar year that coincides with period of ownership or operatorship, unless otherwise directed by DEQ. Submit both an emissions inventory and the certification statement required by LAC 33:III.919.F.1.c, separately for each AI, in a format specified by DEQ. Include the information specified in LAC 33:III.919.F.1.a through F.1.d.

Appendix 9

RMP Registration and De-Registration

Section 1. Registration Information

Source Identification

Facility Name:	LBC Baton Rouge, LLC
Parent Company #1 Name:	LBC Houston, LP
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	First-time submission
Subsequent RMP Submission Reason:	
Description:	
Receipt Date:	08-Apr-2011
Postmark Date:	08-Apr-2011
Next Due Date:	08-Apr-2016
Completeness Check Date:	08-Apr-2011
Complete RMP:	Yes
De-Registration / Closed Reason:	04
De-Registration / Closed Reason Other Text:	Project cancelled, product never handled at Facility
De-Registered / Closed Date:	03-Aug-2011
De-Registered / Closed Effective Date:	29-Jul-2011
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0021 3002
Other EPA Systems Facility ID:	LAD096040712
Facility Registry System ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	92487172
Parent Company #1 DUNS:	
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	1725 Hwy 75
Street 2:	
City:	Sunshine
State:	LOUISIANA
ZIP:	70780
ZIP4:	
County:	IBERVILLE

Facility Latitude and Longitude

Latitude (decimal):	30.284444
Longitude (decimal):	-091.134833
Lat/Long Method:	Interpolation - Map
Lat/Long Description:	Plant Entrance (General)
Horizontal Accuracy Measure:	25
Horizontal Reference Datum Name:	North American Datum of 1983
Source Map Scale Number:	24000

Appendix 10
Title V Permit 1280-00025-V4 application,
selected pages

MAIN FILE



May 31, 2013

Louisiana Department of Environmental Quality
Office of Environmental Services
Air Permits Division
P.O. Box 4313
Baton Rouge, LA 70821-4313

original to JOA
copy to Petro/Batou
PMA

Re: LBC Baton Rouge LLC, Sunshine Terminal (AI 3492)
Title V Permit Minor Modification Application

PER20130001

To Whom It May Concern:

LBC Baton Rouge, LLC (LBC) owns and operates the Sunshine Terminal, located in Iberville Parish, Louisiana. LBC is submitting a Part 70 Minor Permit Modification application to the Louisiana Department of Environmental Quality (LDEQ) Air Permitting Division to authorize the construction and operation of an additional rail car loading and unloading spots at their Sunshine Terminal. The facility operations are currently authorized under Title V Permit No. 1280-00025-V3 issued August 10, 2012.

In accordance with LAC 33:III.525.B.1, this application includes all required information pertaining to the project. A certification statement is provided and is signed by a responsible official as well as a licensed Professional Engineer. LBC is including a check for \$9,455.00 as well as a Request for Expedited Permit Processing Form (Appendix D) for review of this Part 70 Minor Permit Modification in accordance with 33 LAC III: Chapter 2, §223 Fee Schedule Listing (Permit Fee 2010). A copy of this application is also being sent to the EPA Region 6 office.

LBC appreciates your expeditious review and approval of this request and should you have any questions, please contact Ms. Danielle Busey at (281) 291-3418 or via email at dbusey@lbchouston.com

Regards,

A handwritten signature in blue ink that reads "Danielle Busey".

Danielle Busey
Assistant Manager Regulatory Compliance
LBC Houston/Baton Rouge
Phone: (281) 291-3418

Enclosures

DEQ - OES
2013 JUN -7 PM 1:20

LBC Houston-Baton Rouge

Bayport Terminal
Bayport Industrial Complex
11666 Port Road
Seabrook, Texas 77586-USA

Corporate Office USA
Phone: (281) 474-4433
Fax: (281) 291-3428

www.lbctt.com



**LBC Baton Rouge, LLC
Title V Permit Minor Modification
Application
Sunshine Terminal
Iberville Parish, Louisiana
Agency Interest No. 3492**

May 2013

Prepared for:

LBC Baton Rouge LLC
11666 Port Road
Seabrook, Texas 77586



Prepared by:

Alliant Environmental, LLC
1842 Snake River Road
Katy, Texas 77449



LDEQ Title V Permit Minor Modification Application**TABLE OF CONTENTS**

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LDEQ Title V Permit Minor Modification Application

10. Professional Engineer (P.E) Seal

As required in LAC 33:III.517.B.3, any permit application for a major source, including Part 70 applications, must be certified by a professional engineer. LBC Baton Rouge Sunshine Terminal is a major source and, therefore, the proposed minor modification has been certified by Steven S. Flannigan, P.E., Louisiana Professional Engineer License No. PE 0033081.

Department of Environmental Quality Office of Environmental Services Air Permits Division P.O. Box 4313 Baton Rouge, LA 70821-4313 (225) 219-3181	LOUISIANA Application for Approval of Emissions of Air Pollutants from Part 70 Sources Paperwork Reduction Format	
--	--	---

PLEASE TYPE OR PRINT

1. Facility Information [LAC 33:III.517.D.1]

Facility Name or Process Unit Name (if any) Sunshine Terminal		☒ All Process Units ☐ Process Unit-specific Permit
Agency Interest Number (A.I. Number) 3492	Currently Effective Permit Number(s) 1280-00025-V3	
Company - Name of Owner LBC Baton Rouge, LLC		
Company - Name of Operator (if different from Owner)		
Parent Company (if Company - Name of Owner given above is a division) LBC Houston, L.P.		

Ownership:

Check the appropriate box.

- ☒ corporation, partnership, or sole proprietorship
 ☐ regulated utility
 ☐ municipal government
☐ state government
 ☐ federal government
 ☐ other, specify _____

2. Physical Location and Process Description**[LAC 33:III.517.D.18, unless otherwise stated]***What modifications/changes are proposed in this application? Add more rows as necessary.*

This application is for a minor Title V Permit modification to include the following changes:

- Modifying the existing rail car loading and unloading facility (EQT044) to incorporate additional spots for rail car loading and unloading, resulting in an increased maximum loading rate and maximum short-term VOC emission rate (lb/hr);
- Increasing the VOC flow to Flare FL-3 to account for the increase in rail car loading rate, resulting in an increased maximum short-term VOC emission rate (lb/hr)

- ☒ Map attached (required per LAC 33:III.517.D.1)
☒ Description of processes and products attached (required per LAC 33:III.517.D.2)
☒ Introduction/Description of the proposed project attached (required per LAC 33:III.517.D.5)

4. Type of Application [LAC 33:III.517.D]

Complete the appropriate column (1 or 2) that corresponds to the type of permit being sought. Check all that apply within the appropriate column.

Column 1	Column 2
☐ Part 70 General	☒ Part 70 Regular
☐ Renewal	☐ Renewal

Select one, if applicable: ☐ Entirely new facility ☐ Modification or expansion of existing facility (may also include reconciliations) ☐ Reconciliation only ☐ Individual emissions unit(s) addition	Select one, if applicable: ☐ Entirely new facility ☐ Significant modification or expansion of existing facility (may also include reconciliations) [LAC 33:III.527] ☒ Minor modification or expansion of existing facility (may also include reconciliations) [LAC 33:III.525] ☐ Reconciliation only NSR Analysis: PSD ☐ NNSR ☐
--	--

Does this submittal update or replace an application currently under review? ☐ Yes ☒ No

If yes, provide date that the prior application was submitted: _____

Select one if this application is for an existing facility that does not have an air quality permit:

- ☐ Previously Grandfathered (LAC 33:III.501.B.6)
☐ Previously Exempted (e.g., Small Source Exemption; Act 918)
☐ Previously Unpermitted

5. Fee Information [LAC 33:III.517.D.17]

Fee Parameter: If the fee code is based on an operational parameter (such as number of employees or capital cost), enter that parameter here. _____

Industrial Category: Enter the Standard Industrial Classification (SIC) Codes that apply to the facility.

Primary SICC: 4226

Secondary SICC(s): _____

Project Fee Calculation: Enter fee code, permit type, production capacity/throughput, and fee amount pursuant to LAC 33:III.Chapter 2. Add rows to this table as needed. Include with the application the amount in the Grand Total blank as the permit application fee.

FEE CODE	TYPE	EXISTING CAPACITY	INCREMENTAL CAPACITY INCREASE	SURCHARGES				TOTAL AMOUNT
				MULTIPLIER	NSPS	PSD	AIR TOXICS	
1340	Minor	126 million gallons	-		☒	☐	☐	\$9,455.00
					☐	☐	☐	\$
					☐	☐	☐	\$
GRAND TOTAL								\$9,455.00

****Optional** Fee Explanation:** Use the space provided to give an explanation of the fee determination displayed above.

Minor Modification Fee: \$7,564 * 25% NSPS Surcharge (\$1,891) = \$9,455.00

Electronic Fund Transfer (EFT): If paying the permit application fee using an Electronic Fund Transfer (EFT), please include the EFT Transaction Number, the Date that the EFT was made, and the total dollar amount submitted in the EFT. If not paying the permit application fee using EFT, leave blank.

EFT Transaction Number _____

Date of Submittal _____

Total Dollar Amount

\$ _____

6. Key Dates

Estimated date construction will commence: 8/1/2013 Estimated date operation will commence: 10/1/2013

10. Certification of Compliance With Applicable Requirements

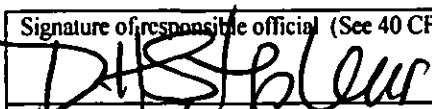
Statement for Applicable Requirements for Which the Company and Facility Referenced In This Application Is In Compliance

Based on information and belief, formed after reasonable inquiry, the company and facility referenced in this application is in compliance with and will continue to comply with all applicable requirements pertaining to the sources covered by the permit application, as outlined in Tables 1 and 2 in the permit application. For requirements promulgated as of the date of this certification with compliance dates effective during the permit term, I further certify that the company and facility referenced in this application will comply with such requirements on a timely basis and will continue to comply with such requirements.

For corporations only: By signing this form, I certify that, in accordance with the definition of Responsible Official found in LAC 33:III.502, (1) I am a president, secretary, treasurer, or vice-president in charge of a principal business function, or other person who performs similar policy or decision-making functions; or (2) I am a duly authorized representative of such person; am responsible for the overall operation of one or more manufacturing, production, or operating facilities addressed in this permit application; and either the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars); or the delegation of authority has been approved by LDEQ prior to this certification.*

CERTIFICATION: I certify, under provisions in Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information contained in this Application for Approval of Emissions of Air Pollutants from Part 70 Sources, including all attachments thereto and the compliance statement above, are true, accurate, and complete.

a. Responsible Official		
Name David H. Stephens		
Title Operations Director		
Company LBC Baton Rouge, LLC		
Suite, mail drop, or division		
Street or P.O. Box 11666 Port Road		
City Seabrook	State TX	Zip 77586
Business phone 281-474-4433		
Email Address d-stephens@lbctt.com		

Signature of responsible official (See 40 CFR 70.2): 	
Date: 5/29/2013	

*Approval of a delegation of authority can be requested by completing a Duly Authorized Representative Designation Form (Form 7218) available on LDEQ's website at <http://www.deq.louisiana.gov/portal/tabid/2758/Default.aspx>

CERTIFICATION: I certify that the engineering calculations, drawings, and design are true and accurate to the best of my knowledge.

b. Professional Engineer		
Name Shawn Flannigan		
Title Principal		
Company Alliant Environmental, LLC		
Suite, mail drop, or division		
Street or P.O. Box 1842 Snake River Road		
City Katy	State TX	Zip 77449
Business phone 281-717-4392		
Email Address sflannigan@alliantenv.com		

Signature of Professional Engineer: 	
Date: 6/31/13	
Louisiana Registration No.	PE 0033081

11. Personnel [LAC 33:III.517.D.1]

a. Manager of Facility who is located at plant site		
Name Kevin Chimento	☐ Primary contact	
Title Terminal Manager		
Company LBC Baton Rouge, LLC		
Suite, mail drop, or division		
Street or P.O. Box 1725 Highway 75		
City Sunshine	State LA	Zip 70780
Business phone 225-642-8335 ext. 4101		
Email address kchimento@lbchouston.com		

b. On-site contact regarding air pollution control		
Name Kevin Chimento	☐ Primary contact	
Title Terminal Manager		
Company LBC Baton Rouge, LLC		
Suite, mail drop, or division		
Street or P.O. Box 1725 Highway 75		
City Sunshine	State LA	Zip 70780
Business phone 225-642-8335 ext. 4101		
Email address kchimento@lbchouston.com		

c. Person to contact with written correspondence		
Name Danielle Bussey	☒ Primary contact	
Title Assistant Manager Environmental Compliance		
Company LBC Baton Rouge, LLC		
Suite, mail drop, or division		
Street or P.O. Box 11666 Port Road		
City Seabrook	State TX	Zip 77586
Business phone 281-291-3418		
Email address dbush@lbchouston.com		

d. Person who prepared this report		
Name Shawn Flannigan	☐ Primary contact	
Title Principal		
Company Alliant Environmental, LLC		
Suite, mail drop, or division		
Street or P.O. Box 1842 Snake River Road		
City Katy	State TX	Zip 77449
Business phone 281-717-4392		
Email address sflannigan@alliantenv.com		

e. Person to contact about Annual Maintenance Fees		☐ a ☐ b ☒ c ☐ d ☐ other (specify below)	
Name	☐ Primary contact	Suite, mail drop, or division	
Title		Street or P.O. Box	
Company		City	State Zip
Business Phone		Email Address	

Appendix 11
Shawn Flannigan Louisiana PE License 0033081
expired 9/30/2011

LOUISIANA PROFESSIONAL ENGINEERING AND LAND SURVEYING BOARD

As of 12/06/2018, the Louisiana Professional Engineering and Land Surveying Board (LAPELS) has the following information on file:

Mr. Steven Shawnacey Fla
21811 Ann Circle
Magnolia, TX 77355-4591

	LOUISIANA PROFESSIONAL ENGINEERING & LAND SURVEYING BOARD (LAPELS)	
	9643 Brookline Avenue, Suite 121 Baton Rouge, LA 70809 Phone (225) 925-6291 www.lapels.com	
Mr. Steven Shawnacey Flannigan		
License/Certificate Type - Number	Expiration Date	
PE.0033081	09/30/2011	
Status: Expired		

Fold Here →

Cut Here ←

Please be advised that your license must be in "Active" status in order for you to (a) provide or offer to provide engineering or land surveying services in Louisiana or (b) use the words "engineer", "engineering", "land surveyor", "land surveying" or any modification or derivative thereof in your name or in connection with your business or activities in Louisiana. Licensees whose licenses are in "Retired", "Inactive", or "Expired" status are prohibited from engaging in the activities described above in items (a) and (b).

LA R. S. 37:689 requires firms practicing or offering to practice engineering or land surveying in the state of Louisiana to be licensed by the Board prior to offering such services.

Print and keep the following information for your record or verification. The pocket card may also be printed on card stock or laminated to keep with you as license/certificate verification.

Disclaimer

All information provided by LAPELS on this web page, and on its other web pages and internet sites, is made available to provide immediate access for the convenience of interested persons. While LAPELS believes the information to be reliable, human or mechanical error remains a possibility, as does delay in the posting or updating of information. Therefore, LAPELS makes no guarantee as to the accuracy, completeness, timeliness, currency, or correct sequencing of the information. Neither LAPELS, nor any of the sources of the information, shall be responsible for any errors or omissions, or for the use or results obtained from the use of this information. Other specific cautionary notices may be included on other web pages maintained by LAPELS.

If you need to make changes to your contact information, please choose one of the following options below:

Contact update for [Individuals](#)

Contact update for [Firms](#)

License/Certificate Types:

EF = Engineering Firm

VF = Land Surveying Firm

CPD = Continuing Professional Development Sponsor/Provider

*PE = Professional Engineer

*PLS = Professional Land Surveyor

*EI = Engineer Intern

*LSI = Land Surveyor Intern

*PE Discipline Codes

AG	Agricultural	ME	Mechanical
AR	Architectural	MI	Mining or Mineral
CH	Chemical	MT	Metallurgical
CE	Civil	MU	Manufacturing
CS	Control Systems	NV	Naval Architecture & Marine
EE	Electrical & Computer	NU	Nuclear
EV	Environmental	ST	Structural *
FP	Fire Protection	PT	Petroleum
IE	Industrial		
* An engineer that has passed the Structural I exam is listed as a Civil Engineer. An engineer that has passed both the Structural I and II exams is listed as Structural (ST) and a Civil (CE) Engineer.			

Appendix 12
NESHAP Subpart EEEE NOCS –
Initial and Tanks 80-1 and 80-2



August 13, 2007

Office of Environmental Services
LDEQ – Capital Region Office
P.O. Box 4312
Baton Rouge, LA 70821-4312

RECEIVED
AUG 21 2007
DEPT. OF ENVIRONMENTAL QUALITY

RE: LBC Houston L. P.
OLD MACT Notification of Compliance Status
Agency Interest No.: 3492

Per 40 CFR 63, Subpart EEEE, attached please find the Notification of Compliance Status for LBC Baton Rouge, LLC.

Please contact me at 281-291-3498 or r-mendez@lbctt.com if any additional information is needed.

Sincerely,

A handwritten signature in black ink, appearing to read "Rafael E. Mendez". The signature is stylized with a large, sweeping initial "R" and "M".

Rafael E. Mendez
Assistant Manager, Regulatory Compliance

CC: LDEQ
Office of Environmental Services
P.O. Box 4313
Baton Rouge, LA 70821-4313

JG, MG

LBC Houston-Baton Rouge

Bayport Terminal
Bayport Industrial Complex
11666 Port Road
Seabrook, Texas 77586-USA

Corporate Office USA
tel: 281-474-4433
fax: 281-291-3428

www.lbctt.com

**National Emission Standards for Hazardous Air Pollutants:
Organic Liquid Distribution (Non-Gasoline)
(40 CFR 63 EEEE)**

Notification of Compliance Status
40 CFR 63.2382(d)

Company and Facility Information					
Permit Number	1280-00025-VO	County or Parish	Iberville	Date Permit Issued	8/15/2006
Company Name	LBC Baton Rouge, LLC				
Facility Name and Address	LBC Sunshine Terminal 1725 Hwy 75 Sunshine, LA 70780			Agency Interest Number (if applicable)	3492
Mailing Address	11666 Port Road				
City	Seabrook	State	TX	Zip Code	77586
Contact Name	Rafael E. Mendez				
Phone Number	281-291-3498		Fax Number	281-291-3428	
E-mail Address	r-mendez@lbctt.com				
Principal Facility Product/Business	Bulk Liquid Terminal				
New or Existing Facility	Existing Facility				

§63.2382(d)(2) The notification of compliance status must include the information required in §63.999(b) and in paragraphs (d)(2)(i) through (viii) of this section.

§63.2382(d)(2)(i) The results of any applicability determinations, emission calculations, or analyses used to identify and quantify organic HAP emissions for the affected source.

**Table 1
Storage Tanks Applicability Determination**

Equip ID	Storing Crude (Y/N)	Organic Liquid Stored	Capacity (gallons)	Annual Average True Vapor Pressure (psia)	Control Required (Y/N)	If Yes, Type	Control Device ID
55-4	No	Benzene	2,310,000	>0.1	Yes	IFR	NA
55-5	No	Natural Gasoline	2,310,000	>0.1	Yes	IFR	NA
55-6	No	Benzene	2,310,000	>0.1	Yes	IFR	NA
55-8	No	Toluene	2,310,000	>0.1	Yes	IFR	NA
55-9	No	Natural Gasoline	2,310,000	>0.1	Yes	IFR	NA
55-10	No	Natural Gasoline	2,310,000	>0.1	Yes	IFR	NA
55-11	No	Natural Gasoline	2,310,000	>0.1	Yes	IFR	NA
55-13	No	Benzene	2,310,000	>0.1	Yes	IFR	NA
80-6	No	Benzene	3,360,000	>0.1	Yes	IFR	NA
80-7	No	Benzene	3,360,000	>0.1	Yes	IFR	NA
80-8	No	Benzene	3,360,000	>0.1	Yes	IFR	NA
80-9	No	Pyrolysis Gas	3,360,000	>0.1	Yes	IFR	NA
120-1	No	Natural Gasoline	5,040,000	>0.1	Yes	IFR	NA
120-2	No	Natural Gasoline	5,040,000	>0.1	Yes	IFR	NA

Table 2
Transfer Racks Applicability Determination

Equip ID	Facility-Wide Transfer of Organic Liquids through Transfer Racks out of the Facility (gal/yr)	For existing sources: Organic HAP content ≥ 98 wt% (Y/N)	For new sources: Organic HAP content ≥ 25 wt% (Y/N)	Control Required (Y/N)	If Yes, Type	Control Device ID
Truck Rack	< 800,000	Yes	NA	No	NA	NA
Rail Rack						

For transfer racks at new facilities, are containers >55 gallons being filled? (Y/N)

Source is an existing facility, therefore, not applicable

If yes, state control option chosen:

Is the OLD MACT affected source subject to the equipment leak standards in the OLD MACT? (Y/N)

Sources are subject to equipment leak standards.

If so, state the equipment leak monitoring program with which the facility is opting to comply – Subpart TT, Subpart UU, Subpart H.

Facility will comply with Subpart TT.

§63.2382(d)(2)(ii) *The results of emissions profiles, performance tests, engineering analyses, design evaluations, flare compliance assessments, inspections and repairs, and calculations used to demonstrate initial compliance according to Tables 6 and 7 to this subpart. For performance tests, results must include descriptions of sampling and analysis procedures and quality assurance procedures.*

Table 3
Initial Compliance Demonstration Results

Control Method or Device Number	Method of Initial Compliance Demonstration	Results	Location of Documentation
80-9	IFR Inspection	Passed	Facility
120-1	IFR Inspection	Passed	Facility
120-2	IFR Inspection	Passed	Facility

NOTE: Other tanks in OLD service have not been inspected as they were in operation prior to rule compliance date and have not been emptied and degassed. Inspection will occur at the next empty and degas, but no later than February 3, 2014

§63.2382(d)(2)(iii) *Descriptions of monitoring devices, monitoring frequencies, and the operating limits established during the initial compliance demonstrations, including data and calculations to support the levels you establish.*

This section is not applicable

Table 4
Monitoring Methods for Required Controls Method

Equip ID	Monitoring Device	Monitoring Frequency	Operating Limits	Location of Documentation
Not Applicable				

§63.2382(d)(2)(iv) Descriptions of worst-case operating and/or testing conditions for the control device(s).

This section is not applicable.

§63.2382(d)(2)(v) Identification of emission sources subject to overlapping requirements described in §63.2396 and the authority under which you comply.

Table 5
Overlap Requirements for Storage Tanks (§63.2396(a))

Tank ID	Answer for each tank (Y/N)				
	Is tank subject to Kb as a result of complying with another 40 CFR 63 subpart?	Is tank subject to Kb <u>not</u> as a result of complying with another 40 CFR 63 subpart?	Is tank subject to 40 CFR 61 subpart Y?	Is tank in OLD operation?	Result (comments)
55-4	No	No	Yes	Yes	Comply with WW
55-5	No	No	No	Yes	Comply with WW
55-6	No	No	Yes	Yes	Comply with WW
55-8	No	No	No	Yes	Comply with WW
55-9	No	No	No	Yes	Comply with WW
55-10	No	No	No	Yes	Comply with WW
55-11	No	No	No	Yes	Comply with WW
55-13	No	No	Yes	Yes	Comply with WW
80-6	No	No	Yes	Yes	Comply with WW
80-7	No	No	Yes	Yes	Comply with WW
80-8	No	No	Yes	Yes	Comply with WW
80-9	No	No	Yes	Yes	Comply with WW
120-1	No	Yes	No	Yes	Comply with WW
120-2	No	Yes	No	Yes	Comply with WW

Table 6
Overlap Requirements for Transfer Racks

Transfer Rack ID	Answer for each rack (Y/N)		
	Is transfer rack subject to 40 CFR 61 subpart BB?	Is rack in OLD operation?	Result (comments)
Not Applicable			

Table 7
Overlap Requirements for Equipment Leak Components (§63.23969(c))
(Pumps, Valves, and Sampling Connections)

Equipment Group Designations (if any)	Answer for equipment leak components (Y/N)				
	Are components subject to a 40 CFR 60 subpart?	Are components subject to 40 CFR part 63 subpart GGG?	Are components in OLD operation?	Are components in organic liquid service?	Result (comments)
55-4	No	No	Yes	Yes	Comply with TT
55-5	No	No	Yes	Yes	Comply with TT
55-6	No	No	Yes	Yes	Comply with TT
55-8	No	No	Yes	Yes	Comply with TT
55-9	No	No	Yes	Yes	Comply with TT
55-10	No	No	Yes	Yes	Comply with TT
55-11	No	No	Yes	Yes	Comply with TT
55-13	No	No	Yes	Yes	Comply with TT
80-6	No	No	Yes	Yes	Comply with TT
80-7	No	No	Yes	Yes	Comply with TT
80-8	No	No	Yes	Yes	Comply with TT
80-9	No	No	Yes	Yes	Comply with TT
120-1	No	No	Yes	Yes	Comply with TT
120-2	No	No	Yes	Yes	Comply with TT

NOTE: Facility is a for-hire bulk liquid terminal. Product Storage changes based on customer demands. As a result, applicability changes with changes in products stored.

§63.2382(d)(vi) *The applicable information specified in §63.1039(a)(1) through (3) for all pumps and valves subject to the work practice standards for equipment leak components in Table 4 to this subpart, item 4.*

Table 8
Pumps and Valves (§63.1039(a)(1))

Process unit or affected facility	Number of valves ¹	Method of compliance ²	Planned schedule for valves	Number of pumps ¹	Method of compliance ²	Planned schedule for pumps
55-4	18	Monthly monitoring	February, 2007	1	Monthly monitoring	February, 2007
55-5	33	Monthly monitoring	February, 2007	1	Monthly monitoring	February, 2007
55-6	28	Monthly monitoring	February, 2007	1	Monthly monitoring	February, 2007
55-8	28	Monthly monitoring	February, 2007	1	Monthly monitoring	February, 2007
55-9	8	Monthly monitoring	February, 2007	0	Monthly monitoring	February, 2007
55-10	8	Monthly monitoring	February, 2007	0	Monthly monitoring	February, 2007
55-11	8	Monthly monitoring	February, 2007	0	Monthly monitoring	February, 2007
55-13	9	Monthly monitoring	February, 2007	0	Monthly monitoring	February, 2007
80-6	45	Monthly monitoring	February, 2007	1	Monthly monitoring	February, 2007
80-7	9	Monthly monitoring	February, 2007	0	Monthly monitoring	February, 2007
80-8	9	Monthly monitoring	February, 2007	0	Monthly monitoring	February, 2007
80-9	27	Monthly monitoring	February, 2007	1	Monthly monitoring	February, 2007
120-1	32	Monthly monitoring	February, 2007	0	Monthly monitoring	February, 2007
120-2	10	Monthly monitoring	February, 2007	0	Monthly monitoring	February, 2007

¹Do not include components in vacuum service.

²Indicate "monthly leak detection and repair" or "equipped with dual mechanical seals," etc.

Table 9
Process units or facilities electing to use pressure testing of batch product-process equipment (§63.1039(a)(2))

Process Unit	Pump/Valve (P/V)	Batch Products or Product Codes	Schedule for Pressure Testing
Not Applicable			

Table 10
Process units or facilities electing to comply with the alternative requirements for enclosed-vented facilities in §63.1037 (§63.1039(a)(3))

Process Unit	Pump/Valve (P/V)	System used to create negative pressure enclosure	Control device
Not Applicable			

§63.2382(d)(2)(vii) If you are complying with the vapor balancing work practice for transfer racks according to table 4 to this subpart, item 3.a, include a statement to that effect and a statement that the pressure vent settings on the affected storage tanks are greater than or equal to 2.5 psig.

This section is not applicable.

§63.2382(d)(2)(viii) The information specified in §63.2386(c)(10)(i), unless the information has already been submitted with the first Compliance report. If the information specified in §63.2386(c)(10)(i) has already been submitted with the first Compliance report, the information specified in §63.2386(d)(3) and (4), as applicable, shall be submitted.

This information has been included in the First Compliance Report.



September 24, 2013

Office of Environmental Services
LDEQ – Capital Region Office
P.O. Box 4312
Baton Rouge, LA 70821-4312

RECEIVED
OCT 03 2013
LDEQ/OEC
ENFORCEMENT DIVISION

RE: LBC Houston L. P.
OLD MACT Notification of Compliance Status
Agency Interest No.: 3492

Per 40 CFR 63, Subpart EEEE, attached please find the Notification of Compliance Status for LBC Baton Rouge, LLC.

Please contact me at 281-291-3418 or dbush@lbchouston.com if any additional information is needed.

Sincerely,

A handwritten signature in black ink that reads "Danielle L. Bush". The signature is written in a cursive, flowing style.

Danielle L. Bush
Assistant Manager, Environmental Compliance

CC: LDEQ
Office of Environmental Services
P.O. Box 4313
Baton Rouge, LA 70821-4313

LBC Houston-Baton Rouge

Bayport Terminal
Bayport Industrial Complex
11666 Port Road
Seabrook, Texas 77586-USA

Corporate Office USA
tel: 281-474-4433
fax: 281-291-3428

www.lbcctt.com

**National Emission Standards for Hazardous Air Pollutants:
Organic Liquid Distribution (Non-Gasoline)
(40 CFR 63 EEEE)**

Notification of Compliance Status
40 CFR 63.2382(d)

Company and Facility Information					
Permit Number	1280-00025-V5	County or Parish	Iberville	Date Permit Issued	8/27/2013
Company Name	LBC Baton Rouge, LLC				
Facility Name and Address	LBC Sunshine Terminal 1725 Hwy 75 Sunshine, LA 70780			Agency Interest Number (if applicable)	3492
Mailing Address	11666 Port Road				
City	Seabrook	State	TX	Zip Code	77586
Contact Name	Danielle L. Bush				
Phone Number	281-291-3418		Fax Number	281-291-3428	
E-mail Address	dbush@lbchouston.com				
Principal Facility Product/Business	Bulk Liquid Terminal				
New or Existing Facility	Existing Facility				

§63.2382(d)(2) *The notification of compliance status must include the information required in §63.999(b) and in paragraphs (d)(2)(i) through (viii) of this section.*

§63.2382(d)(2)(i) *The results of any applicability determinations, emission calculations, or analyses used to identify and quantify organic HAP emissions for the affected source.*

**Table 1
Storage Tanks Applicability Determination**

Equip ID	Storing Crude (Y/N)	Organic Liquid Stored	Capacity (gallons)	Annual Average True Vapor Pressure (psia)	Control Required (Y/N)	If Yes, Type	Control Device ID
80-1	No	Benzene	3,360,000	>0.1	Yes	IFR	NA

**Table 2
Transfer Racks Applicability Determination**

Equip ID	Facility-Wide Transfer of Organic Liquids through Transfer Racks out of the Facility (gal/yr)	For existing sources: Organic HAP content ≥ 98 wt% (Y/N)	For new sources: Organic HAP content ≥ 25 wt% (Y/N)	Control Required (Y/N)	If Yes, Type	Control Device ID

NOTE: All facility transfer racks were included in previous compliance status notification.

For transfer racks at new facilities, are containers >55 gallons being filled? (Y/N)

Source is an existing facility, therefore, not applicable

If yes, state control option chosen:

Is the OLD MACT affected source subject to the equipment leak standards in the OLD MACT? (Y/N)

Sources are subject to equipment leak standards.

If so, state the equipment leak monitoring program with which the facility is opting to comply – Subpart TT, Subpart UU, Subpart H.

Facility will comply with Subpart TT.

§63.2382(d)(2)(ii) The results of emissions profiles, performance tests, engineering analyses, design evaluations, flare compliance assessments, inspections and repairs, and calculations used to demonstrate initial compliance according to Tables 6 and 7 to this subpart. For performance tests, results must include descriptions of sampling and analysis procedures and quality assurance procedures.

Table 3
Initial Compliance Demonstration Results

Control Method or Device Number	Method of Initial Compliance Demonstration	Results	Location of Documentation
80-1	IFR Inspection	Passed	Facility

§63.2382(d)(2)(iii) Descriptions of monitoring devices, monitoring frequencies, and the operating limits established during the initial compliance demonstrations, including data and calculations to support the levels you establish.

This section is not applicable

Table 4
Monitoring Methods for Required Controls Method

Equip ID	Monitoring Device	Monitoring Frequency	Operating Limits	Location of Documentation
Not Applicable				

§63.2382(d)(2)(iv) Descriptions of worst-case operating and/or testing conditions for the control device(s).

This section is not applicable.

§63.2382(d)(2)(v) Identification of emission sources subject to overlapping requirements described in §63.2396 and the authority under which you comply.

Table 5
Overlap Requirements for Storage Tanks (§63.2396(a))

Tank ID	Answer for each tank (Y/N)				
	Is tank subject to Kb as a result of complying with another 40 CFR 63 subpart?	Is tank subject to Kb <u>not</u> as a result of complying with another 40 CFR 63 subpart?	Is tank subject to 40 CFR 61 subpart Y?	Is tank in OLD operation?	Result (comments)
80-1	No	Yes	Yes	Yes	Comply with WW

Table 6
Overlap Requirements for Transfer Racks

Transfer Rack ID	Answer for each rack (Y/N)		
	Is transfer rack subject to 40 CFR 61 subpart BB?	Is rack in OLD operation?	Result (comments)
Not Applicable			

Table 7
Overlap Requirements for Equipment Leak Components (§63.23969(c))
(Pumps, Valves, and Sampling Connections)

Equipment Group Designations (if any)	Answer for equipment leak components (Y/N)				
	Are components subject to a 40 CFR 60. subpart?	Are components subject to 40 CFR part 63 subpart GGG?	Are components in OLD operation?	Are components in organic liquid service?	Result (comments)
80-1	No	No	Yes	Yes	Comply with TT

NOTE: Facility is a for-hire bulk liquid terminal. Product Storage changes based on customer demands. As a result, applicability changes with changes in products stored.

§63.2382(d)(vi) *The applicable information specified in §63.1039(a)(1) through (3) for all pumps and valves subject to the work practice standards for equipment leak components in Table 4 to this subpart, item 4.*

Table 8
Pumps and Valves (§63.1039(a)(1))

Process unit or affected facility	Number of valves ¹	Method of compliance ²	Planned schedule for valves	Number of pumps ¹	Method of compliance ²	Planned schedule for pumps
80-1	15	Monthly monitoring	October, 2013	1	Monthly monitoring	October, 2013

¹Do not include components in vacuum service.

²Indicate "monthly leak detection and repair" or "equipped with dual mechanical seals," etc.

Table 9
Process units or facilities electing to use pressure testing of batch product-process equipment (§63.1039(a)(2))

Process Unit	Pump/Valve (P/V)	Batch Products or Product Codes	Schedule for Pressure Testing
Not Applicable			

Table 10
Process units or facilities electing to comply with the alternative requirements for
enclosed-vented facilities in §63.1037 (§63.1039(a)(3))

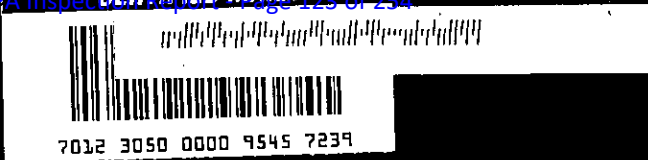
Process Unit	Pump/Valve (P/V)	System used to create negative pressure enclosure	Control device
Not Applicable			

§63.2382(d)(2)(vii) If you are complying with the vapor balancing work practice for transfer racks according to table 4 to this subpart, item 3.a, include a statement to that effect and a statement that the pressure vent settings on the affected storage tanks are greater than or equal to 2.5 psig.

This section is not applicable.

§63.2382(d)(2)(viii) The information specified in §63.2386(c)(10)(i), unless the information has already been submitted with the first Compliance report. If the information specified in §63.2386(c)(10)(i) has already been submitted with the first Compliance report, the information specified in §63.2386(d)(3) and (4), as applicable, shall be submitted.

This information has been included in the First Compliance Report.



LBC
TANK TERMINALS
LBC Houston-Baton Rouge
11666 Port Road, Seabrook, Texas 77586-USA

LDEQ
Office of Environmental Services
P.O. Box 4313
Baton Rouge, LA 70821-4313

DEC / Air Ent...



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MAR 10 2014
LDEQ/OEC
ENFORCEMENT DIVISION

March 3, 2014

Office of Environmental Services
LDEQ – Capital Region Office
P.O. Box 4312
Baton Rouge, LA 70821-4312

RE: LBC Baton Rouge, LLC
OLD MACT Notification of Compliance Status: 80-2
Agency Interest No.: 3492

Per 40 CFR 63, Subpart EEEE, attached please find the Notification of Compliance Status for LBC Baton Rouge, LLC.

Please contact me at 281-291-3418 or dbush@lbchouston.com if any additional information is needed.

Sincerely,

A handwritten signature in black ink that reads "Danielle L. Bush". The signature is fluid and cursive, with the first name being the most prominent.

Danielle L. Bush
Assistant Manager, Environmental Compliance

CC: LDEQ
Office of Environmental Services
P.O. Box 4313
Baton Rouge, LA 70821-4313

LBC Houston-Baton Rouge

Bayport Terminal
Bayport Industrial Complex
11666 Port Road
Seabrook, Texas 77586-USA

Corporate Office USA
tel: 281-474-4433
fax: 281-291-3428

www.lbctt.com

**National Emission Standards for Hazardous Air Pollutants:
Organic Liquid Distribution (Non-Gasoline)
(40 CFR 63 EEEE)**

Notification of Compliance Status
40 CFR 63.2382(d)

Company and Facility Information					
Permit Number	1280-00025-V5	County or Parish	Iberville	Date Permit Issued	8/27/2013
Company Name	LBC Baton Rouge, LLC				
Facility Name and Address	LBC Sunshine Terminal 1725 Hwy 75 Sunshine, LA 70780			Agency Interest Number (if applicable)	3492
Mailing Address	11666 Port Road				
City	Seabrook	State	TX	Zip Code	77586
Contact Name	Danielle L. Bush				
Phone Number	281-291-3418		Fax Number	281-291-3428	
E-mail Address	dbush@lbchouston.com				
Principal Facility Product/Business	Bulk Liquid Terminal				
New or Existing Facility	Existing Facility				

§63.2382(d)(2) The notification of compliance status must include the information required in §63.999(b) and in paragraphs (d)(2)(i) through (viii) of this section.

§63.2382(d)(2)(i) The results of any applicability determinations, emission calculations, or analyses used to identify and quantify organic HAP emissions for the affected source.

Table 1
Storage Tanks Applicability Determination

Equip ID	Storing Crude (Y/N)	Organic Liquid Stored	Capacity (gallons)	Annual Average True Vapor Pressure (psia)	Control Required (Y/N)	If Yes, Type	Control Device ID
80-2	No	Ethyl Benzene	3,332,490	>0.1	Yes	IFR	NA

Table 2
Transfer Racks Applicability Determination

Equip ID	Facility-Wide Transfer of Organic Liquids through Transfer Racks out of the Facility (gal/yr)	For existing sources: Organic HAP content ≥ 98 wt% (Y/N)	For new sources: Organic HAP content ≥ 25 wt% (Y/N)	Control Required (Y/N)	If Yes, Type	Control Device ID

NOTE: All facility transfer racks were included in previous compliance status notification.

For transfer racks at new facilities, are containers >55 gallons being filled? (Y/N)

Source is an existing facility, therefore, not applicable

If yes, state control option chosen:

Is the OLD MACT affected source subject to the equipment leak standards in the OLD MACT? (Y/N)

Sources are subject to equipment leak standards.

If so, state the equipment leak monitoring program with which the facility is opting to comply – Subpart TT, Subpart UU, Subpart H.

Facility will comply with Subpart TT.

§63.2382(d)(2)(ii) The results of emissions profiles, performance tests, engineering analyses, design evaluations, flare compliance assessments, inspections and repairs, and calculations used to demonstrate initial compliance according to Tables 6 and 7 to this subpart. For performance tests, results must include descriptions of sampling and analysis procedures and quality assurance procedures.

**Table 3
Initial Compliance Demonstration Results**

Control Method or Device Number	Method of Initial Compliance Demonstration	Results	Location of Documentation
80-2	IFR Inspection	Passed	Facility

§63.2382(d)(2)(iii) Descriptions of monitoring devices, monitoring frequencies, and the operating limits established during the initial compliance demonstrations, including data and calculations to support the levels you establish.

This section is not applicable

Table 4
Monitoring Methods for Required Controls Method

Equip ID	Monitoring Device	Monitoring Frequency	Operating Limits	Location of Documentation
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Overlap Requirements for Storage Tanks (§63.2396(a))

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80-2	No	Yes	No	Yes	Comply with WW

Table 6
Overlap Requirements for Transfer Racks

Transfer Rack ID	Answer for each rack (Y/N)		
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Not Applicable			

Table 7
Overlap Requirements for Equipment Leak Components (§63.23969(c))
(Pumps, Valves, and Sampling Connections)

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	Are components subject to a 40 CFR 60 subpart?	Are components subject to 40 CFR part 63 subpart GGG?	Are components in OLD operation?	Are components in organic liquid service?	Result (comments)
80-2	No	No	Yes	Yes	Comply with TT

NOTE: Facility is a for-hire bulk liquid terminal. Product Storage changes based on customer demands. As a result, applicability changes with changes in products stored.

§63.2382(d)(vi) The applicable information specified in §63.1039(a)(1) through (3) for all pumps and valves subject to the work practice standards for equipment leak components in Table 4 to this subpart, item 4.

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Process unit or affected facility	Number of valves ¹	Method of compliance ²	Planned schedule for valves	Number of pumps ¹	Method of compliance ²	Planned schedule for pumps
80-2	15	Monthly monitoring	March, 2014	1	Monthly monitoring	March, 2014

¹Do not include components in vacuum service.

²Indicate “monthly leak detection and repair” or “equipped with dual mechanical seals,” etc.

Table 9
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Process Unit	Pump/Valve (P/V)	Batch Products or Product Codes	Schedule for Pressure Testing
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Table 10
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Process Unit	Pump/Valve (P/V)	System used to create negative pressure enclosure	Control device
Not Applicable			

§63.2382(d)(2)(vii) If you are complying with the vapor balancing work practice for transfer racks according to table 4 to this subpart, item 3.a, include a statement to that effect and a statement that the pressure vent settings on the affected storage tanks are greater than or equal to 2.5 psig.

This section is not applicable.

§63.2382(d)(2)(viii) The information specified in §63.2386(c)(10)(i), unless the information has already been submitted with the first Compliance report. If the information specified in §63.2386(c)(10)(i) has already been submitted with the first Compliance report, the information specified in §63.2386(d)(3) and (4), as applicable, shall be submitted.

This information has been included in the First Compliance Report.

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LBC Houston-Baton Rouge
11666 Port Road, Seabrook, Texas 77586-USA

LDEQ
Office of Environmental Services
P.O. Box 4313
Baton Rouge, LA 70821-4313

Oec/Air Env

Appendix 13

Tank Activity 2015-2018

		OLD MACT			2015				2016					2017					2018				
Tank	Construction Date (if after Initial NOCS)	Initial NOCS 2007	Updated NOCS 2013	Updated NOCS 2014	Landed?	Products	Empty/degas?	Dates	Landed?	Products	VTAP LDAR?	Empty/degas?	Dates	Landed?	Products	VTAP LDAR?	Empty/degas?	Dates	Landed?	Products	VTAP LDAR?	Empty/degas?	Dates
15-2									Y	Nat Gas DA120 + DA135		Y	12/29/16 - 7/2/17										
55-4		Y									1H - n/a 2H - n/a					2H - n/a					2H - n/a		
55-5		Y							Y	Nas Gas Benzene	1H 2H	Y Y	4/11/16 - 4/21/16 6/23/16 - 7/11/16			1H 2H					1H 2H		
55-6		Y									1H 2H					1H 2H					1H 2H		
55-7											1H - n/a 2H - n/a			Y	Toluene/ Xylene mix	2H - n/a	Y	12/2/16 - 12/17/17	Y	Toluene/ Xylene mix Mixed Xylene Reformate	2H - n/a	y? Y?	5/5/18 - 5/5/18 8/8/18 - 8/9/18
55-8		Y			y	Toluene Benzene	Y	3/27/15 - 4/12/15			1H 2H					1H 2H					1H 2H		
55-9		Y									1H - n/a 2H - n/a					2H - n/a					2H - n/a		
55-10		Y									1H 2H					1H 2H					1H 2H		
55-11		Y									1H 2H					1H 2H					1H 2H		
55-13		Y									1H 2H					1H 2H	No tank landings yet 1Q and 4Q 2017 stored benzene				1H 2H		
55-14	2016													Y	Avgas		new svc	2/18/2017					
55-15	2016								Y	Fuel Ethanol		new svc	12/3/2016										
80-1	2013		Y						Y	Benzene Pygas	1H 2H					1H 2H			y	Pygas Benzene	1H 2H	Y	8/5/18 - 9/18/18
80-2	2013			Y					Y	Benzene Ethylbenzene	1H 2H			Y	Ethylbenzene Benzene	1H 2H	N				1H 2H		
80-6		Y									1H 2H					1H 2H					1H 2H		
80-7		Y									1H 2H					1H 2H					1H 2H		
80-8		Y									1H - n/a 2H - n/a					2H - n/a					2H - n/a		
80-9		Y			y	Pygas Benzene	Y	11/9/15 - 12/4/15 (new cust)			1H 2H			Y	Benzene Pygas Aklylate	1H 2H *	N Y	8/6/17 - 12/15/17	Y	Full Range Alkylate Toluene/ Xylene mix Mixed Xylene	2H***	Y? Y?	4/21/18 - 4/22/18 5/5/18 - 5/6/18
110-2	2008								Y	(non-IFR product) Benzene	1H 2H	Y	??? - 5/19/16	Y	Benzene Reformate	1H 2H	N	11/12/17 - 11/13/17	Y	Pygas** Benzene	1H 2H	Y	1/28/18 - 2/22/18
110-3	2008																				2H***		
110-4	2008				Y	Naphtha					1H 2H - not listed					1H 2H					2H***		

		OLD MACT			2015				2016					2017					2018				
Tank	Construction Date (if after Initial NOCS)	Initial NOCS 2007	Updated NOCS 2013	Updated NOCS 2014	Landed?	Products	Empty/degas?	Dates	Landed?	Products	VTAP LDAR?	Empty/degas?	Dates	Landed?	Products	VTAP LDAR?	Empty/degas?	Dates	Landed?	Products	VTAP LDAR?	Empty/degas?	Dates
120-1		Y							Y	Nat Gas Alkylate		Y	5/20/16 - 12/12/16	Y	Alkylate Reformate		Y?	5/27/17 - 12/21/17	Y	Reformate Full Range Alkylate Mixed Xylene Reformate	2H	Y? Y? Y?	2/10/18 - 2/11/18 2/22/18 - 2/23/18 8/4/18 - 8/5/18
120-2		Y							Y	Naphtha Reformate	1H 2H - not listed	Y	5/16/16 - 12/14/16	Y	Reformate Alkylate	1H 2H - n/a	Y?	4/21/17 - 12/30/17	Y	Full Range Alkylate Mixed Xylene Reformate	2H	Y? Y?	4/20/18 - 4/22/18 8/7/18 - 8/8/18

* 2H 2017 VTAP - Tank 80-9 states it contained benzene in 3Q and 4Q 2017 yet landing rpt states alkylate.
** Tank 110-2: 2018 Landing Rpt shows change from Pygas to Benzene, but 2017 had benzene to reformate.
*** tanks are storing "Xylene (Naphtha)

Appendix 14

Tank Landings 2015-2018

2015

[illegible]

Notes:

Tanks with IFRs but product doesn't require one:

55-4 Renewable Diesel

55-9 Octene

110-2 EHC 110

2016

[illegible]

Notes:

Tanks with IFRs but product doesn't require one:

55-4 Renewable Diesel

55-9 Octene

2017

[illegible]

Notes:

Tanks with IFRs but product doesn't require one:

55-4 Renewable Diesel

55-9 Octene

15-2

|

2018

[illegible]

Appendix 15

Sunshine Terminal Tank Table

Tank pit	Tank	Nominal Capacity	Shell Capacity Bbls	Capacity maxi m3	Capacity maxi m3	Dia ft.	Ht ft.	Material SS/CS	Nitrogen Padded	Floating Roof	Remote Gauge	Last API Inspection	Next		Current Product	IFR Seal Type (Primary)	IFR Seal Type (Secondary)
													Inspection Date	Year Built			
3 A	15-2	15000	14973.08	2400	2378.27	52	40	CS	No	Aluminum pontoon	No	2007	2027	1978	EHC 110	HMT Mini Shoe Seal w/Teflon	
4 A	20-1	20000	21261.78	3200	3377.99	67	35	CS	No	Alum w/cable suspension	No	2014	2024	1945	EHC 110	Ultraflote II	
11 B	55-4	55000	53918.53	8700	8569.43	100	40	CS-Heavy Wall	No	Aluminum pontoon	No	2010	2030	1979	Benzene	Ultraflote II	
12 B	55-5	55000	55472.72	8700	8816.50	100	40	CS	No	CS Pan	No	2011	2029	1979	Empty clean	Shoe Seal w/Teflon	Wiper seal double wrap
13 B	55-6	55000	55670.83	8700	8847.99	100	40	CS	No	Aluminum pontoon	No	2005	2012	1979	Benzene	Ultraflote II	
14 B	55-7	55000	55392.12	8700	8803.69	100	40	CS-Heavy Wall	No	Aluminum pontoon	No	2006	2026	1979	Full Range Alkylate	Ultraflote II	
15 B	55-8	55000	53792.96	8700	8549.47	100	40	CS-Heavy Wall	No	Aluminum pontoon	No	2001	2021	1979	Benzene	HMT Mini Shoe Seal w/Teflon	
16 E	55-9	55000	55889.30	8700	8882.72	100	40	CS	Yes	Aluminum pontoon	No	2005	2019	1981	Octene	Ultraflote US I w/Teflon Fabric	
17 E	55-10	55000	55872.37	8700	8880.03	100	40	CS	No	Aluminum pontoon	No	2005	2021	1981	Benzene	Ultraflote II	
18 E	55-11	55000	55908.74	8700	8885.81	100	40	CS	No	Aluminum pontoon	No	2011	2027	1981	Benzene	Ultraflote II	
19 E	55-13	55000	54112.89	8700	8600.33	100	40	CS	No	Aluminum pontoon	No	2005	2015	1981	Benzene	Ultraflote II	
20 E	55-14	55000	55975.65	8700	8896.45	100	40	CS	No	CS Pan w/pontoons	Saab	2016	2026	2016	Avgas	Mech shoe	Urethane wiper
21 E	55-15	55000	56106.06	8700	8917.18	100	40	CS	No	CS Pan w/pontoons	Saab	2016	2026	2016	Fuel EThanol	Mech shoe	MESA SC 1400 wiper
22 C	80-1	80000	79461.00	12700	12629.92	100	40	CS	No	Aluminum pontoon	Saab	2013	2023	2013	Benzene	Mech shoe	Cast Flexible Wiper
23 C	80-2	80000	79344.56	12700	12611.40	100	40	CS	No	Aluminum pontoon	Saab	2013	2023	2013	Benzene	Mech shoe	Cast Flexible Wiper
27 C	80-6	80000	77212.47	12700	12272.47	120	40	CS	No	CS Pan	No	2006	2017	1980	Benzene	Foam Log w/teflon	
28 C	80-7	80000	77068.40	12700	12249.56	120	40	CS	No	CS Pan	No	2002	2017	1980	Benzene	Mech Shoe	Metallic wiper
29 F	80-8	80000	80380.02	12700	12776.01	120	40	CS	Yes	Aluminum pontoon	No	2006	2028	1981	Hexene-1	Ultraflote I	
30 F	80-9	80000	80735.26	12700	12832.48	120	40	CS	No	Aluminum pontoon	No	2008	2025	1981	Full Range Alkylate	Ultraflote II	
32 G	110-1	110000	109982.65	17500	17481.94	140.5	40	CS	No	CS Pan	Saab	2008	2018	2008	Cleaning	Mech Shoe seal w/Teflon	Cast Flexible Wiper
33 G	110-2	110000	110190.53	17500	17514.99	140.5	40	CS	No	CS Pan	Saab	2008	2018	2008	Benzene	Mech Shoe seal w/Teflon	Cast Flexible Wiper
34 G	110-3	110000	109967.99	17500	17479.61	140.5	40	CS	No	CS Pan	Saab	2008	2018	2008	Naphtha	Mech Shoe seal w/Teflon	Cast Flexible Wiper
35 G	110-4	110000	109705.53	17500	17437.89	140.5	40	CS	No	CS Pan	Saab	2008	2018	2008	Naphtha	Mech Shoe seal w/Teflon	Cast Flexible Wiper
36 F	120-1	120000	121762.90	19100	19354.65	134	48	CS	No	Aluminum pontoon	no	2016	2026	2007	Reformate	Mech Shoe w/Ultraflote II sec.	Cast Flexible Wiper
37 F	120-2	120000	122220.60	19100	19427.41	134	48	CS	No	Aluminum pontoon	no	2016	2026	2007	Mixed Xylene	Mech Shoe w/Ultraflote II sec.	Cast Flexible Wiper

Appendix 16

Ultraflote and Ultraseal Specification Sheets

LBC 004

ULTRAFLOTE / PRODUCT COMPATIBILITY

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The marine grade aluminum alloys and specially developed seal materials of the ULTRAFLOTE Cover are compatible with a broad range of petroleum products and petrochemicals. The following list does not include all possible products and is not meant to restrict applications. We believe the information supplied herein is the best currently available on the subject. It is offered as a possible helpful suggestion and is subject to revision as additional knowledge and experience are gained. Due to the wide number of variables which can effect the performance of a material, Ultraflo Corporation makes no guarantee of results and assumes no obligation or liability whatsoever in connection with this information. **ALL WARRANTIES, INCLUDING MERCHANTABILITY AND FITNESS FOR PURPOSE, ARE HEREBY DISCLAIMED AND EXCLUDED.** Ultraflo Corporation personnel will be pleased to discuss your specific needs with you and help you select the most suitable materials for your end use application.

I = US I II = US II WP = Wrapped Seal AL = Aluminum SS = Stainless
 * = Suitability can vary with contaminants &/ or temperature AL/SS = Choice variable

<u>PRODUCT STORED</u>	<u>ULTRA SEAL TYPE</u>	<u>ULTRA FLOTE TYPE</u>	<u>PRODUCT STORED</u>	<u>ULTRA SEAL TYPE</u>	<u>ULTRA FLOTE TYPE</u>
150-SIV Charge	I	AL	Asphalt	I	AL
55/11.5 Solvent	I	AL	Aviation Turbine Fuel	I	AL
ASTM # 1, 2, & 3 Oil	I	AL	BTX Raffinate	I	AL
Acetaldehyde	II*	AL	Benzene	II	AL
Acetevitole	II	AL	Bunker Oil	I	AL
Acetone	II	AL	Butyl Acetate	II	AL*
Acrylate	II	AL	Butyl Acrylate	II	AL
Acrylonitrile	I	AL	Butyl Amine	II	AL
Adiponitrile	II	AL	Butylaldehyde	II	AL
Alcohol	I	AL	C4 - C20 Paraffins	I	AL
Alcohol (Denatured)	I	AL	Carbon Disulfide	WP	AL
Alcohol-Amyl	II*	AL*	Carbon Tetrachloride	WP	AL*/SS
Alcohol-Benzyl	II*	AL	Cat Cracker Gas	I	AL
Alcohol-Butyl (Butanol)	I	AL*	Cellosolve	I	AL/SS
Alcohol-Ethyl (Ethanol)	I	AL*	Coal Tar (Cresote)	II	AL
Alcohol-I.B. (Isobutanol)	II*	AL*	Condensate	I	AL
Alcohol-I.P. (Isopropinol)	II*	AL*/SS	Crude Acetone	II	AL
Alcohol-Methyl (Methanol)	I	AL*/SS	Crude Distillate	I	AL
Alcohol-(Propanol)	I	AL	Crude Ethyl Benzene	WP	AL
Alcohol-(Tertiary Butyl)	II*	AL	Crude Oil (High Sulfur)	I	AL
Alkylate	I	AL	Crude Oil (Sour)	I	AL
Ammonia Nitrate	I	AL*	Crude Oil (Sweet)	I	AL
Aromatic Distillate	II	AL	Crude Oil (Waxy)	I	AL

ULTRAFLOTE / PRODUCT COMPATIBILITY

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<u>PRODUCT STORED</u>	ULTRA	ULTRA	<u>PRODUCT STORED</u>	ULTRA	ULTRA
	SEAL	FLOTE		SEAL	FLOTE
	TYPE	TYPE		TYPE	TYPE
Crude Oil Distillate	I	AL	Hexane	I	AL
Crude Slop Oil	II	AL	Hydraulic Fluids (PetrIM)	I	AL*/SS
Cumene	II	AL	Hydrocarbon Mix	I	AL
Cutter Stock	I	AL	ISOPAR	II	AL
Cyclohexane	I	AL	Iso Octane	I	AL
DMF (n-Dimethylformamide)	II	AL	Isobutylaldehyde	II	AL
DMK (DI-Methyl Ketone)	II	AL	Isobutylene Polymer	II	AL
Desulphurized LVN	II	AL	JP-4	I	AL
Dicyclopentadiene	II	AL	JP-5	I	AL
Diesel Fuel	I	AL	Jet Fuel	I	AL
Distillate Gasoline	I	AL	Kerosene	I	AL
Distillate	I	AL	Ketones (as a class)	II	AL
Dripolene	II	AL	Lacquer Thinner	II	AL
Ethyl Acetate	II	AL/SS	Light Alkylate	I	AL
Ethyl Acrylate	II	AL	Lubricating Oil	I	AL
Ethylene Glycol	I	AL*	MEK (Methyl Ethyl Ketone)	II	AL
Extractor Charge	I	AL	MTBE	II	AL
Feed Stock	II	AL	Methyl Iso Butyl Ketone	II	AL
Fuel Oil (Number 2)	I	AL	Methyl Methacrylate	II	AL
Fuel Oils	I	AL/SS	Methylene Chloride	WP	AL*/SS
Gas Oil	I	AL	Mixed Aromatics	II	AL
Gas Plant Condensate	I	AL	Mixed Butyl Aldehyde	II	AL
Gasoline (Light St. Run)	I	AL	Molasses	I	AL*
Gasoline	I	AL	N-Butyl Aldehyde	II	AL
Gasoline (Aviation)	I	AL	N-Decane	II	AL
Gasoline (Blend)	I	AL	N-Heptane	II	AL
Gasoline (Leaded)	I	AL	N-Hexane	I	AL
Gasoline (Motor)	I	AL	N-Pentane	I	AL
Gasoline (Natural)	I	AL	Naptha	I*	AL
Gasoline (Petrol)	I	AL	Naptha (Light Virgin)	I*	AL
Gasoline (Premium)	I	AL	Naptha (Sour)	I*	AL
Gasoline (Reclaimed)	I	AL	Naptha (Sweet)	I*	AL
Gasoline (Regular)	I	AL	Naptha/Platformer	I*	AL
Gasoline (TCC)	I	AL	Napthalene	II	AL
Gasoline (Unleaded)	I	AL	Nitrile	I	AL
Gasoline Slop	I	AL	Nonane	II	AL
Halogenated Hydrocarbons	I*	AL*/SS	Octane	II	AL
Heptane Charge	I	AL	Oxinol (Ethanol/Methanol)	I	AL

ULTRAFLOTE / PRODUCT COMPATIBILITY

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<u>PRODUCT STORED</u>	<u>ULTRA SEAL TYPE</u>	<u>ULTRA FLOTE TYPE</u>	<u>PRODUCT STORED</u>	<u>ULTRA SEAL TYPE</u>	<u>ULTRA FLOTE TYPE</u>
Para-Xylene	II	AL	Sulphur	I*	AL
Paraffin	I	AL	Tertiary Butyl Amine	II	AL
Paraffin Naptha	I	AL	Tetrachloroethylene	II	AL*
Pentane/Hexane	I	AL	Tetrahydrofuran	II	AL
Perchloroethylene	WP	AL*	Tol-U-Sol	I	AL
Platform PFOH	I	AL	Tol-U-Sol 6	I	AL
Platformate	I	AL	Toluene	II	AL
Platformer Charge	I	AL	Transm/x	I	AL
Polybutene	II	AL	Trichloroethane	WP	AL/SS
Powerformate	I	AL	Trichloroethylene	WP	AL*
Propolyne Oxide	WP	AL	Turpentine	WP	AL
Propylene Glycol	I	AL	Varsol	I	AL
Raffinate	I	AL	Vinyl Acetate Monomer	II	AL
Reformate	I	AL	Vinyltoluene	II	AL
Reformer Charge	I	AL	Waste Liquid	I	SS
Slop	I	AL	Water	I	AL*/SS
Slop Oil	I	AL/SS	Water (Fresh)	I	AL*/SS
Slop Water	I	AL*/SS	Water (Sea or Salt)	I	AL*/SS
Styrene	II	AL	Water-Brackish	I	AL*/SS
Styrene Monomer	II	AL	Xylene	II	AL

FACOMMON\WP\ORIGINAL\COMPAT\AI\WPID

ULTRASEAL I[®] SPECIFICATIONS

COMPOSITION:	PVC-NITRILE BLEND WITH ADDITIVES FOR STRENGTH, ABRASION RESISTANCE, AND CHEMICAL RESISTANCE.
DESCRIPTION:	BLACK, 100% CLOSED CELL, RESILIENT TAPERED WIPER SEAL APPROXIMATELY 13" WIDE BY 1 1/4" THICK AT CLAMP.
WEIGHT:	APPROXIMATELY 2 POUNDS/LIN. FT. (3 kg/m)
DENSITY:	20 POUNDS/CUBIC FT. (320 kg/m ³)
HARDNESS	9-13 PSI (0.633-0.914 kg/cm ²) ASTM D-1036 COMPRESSION - DEFLECTION
TENSILE STRENGTH:	240 PSI (16.87 kg/cm ²) ASTM D-412
% ELONGATION:	200% ASTM D-412
FLAME SPREAD RATING:	APPROXIMATELY 363 ASTM E162 (320 to 408 ACTUALLY OBSERVED)
TEMPERATURE RESISTANCE:	LOW -40°F (-40°C) 180° BEND ON 1/2" MANDREL HIGH CONTINUOUS 150°F (65.5°C) HIGH INTERMITTENT 220°F (104.4°C)
WEATHER RESISTANCE:	EXPOSURE RACK - 180° BEND ON 2" MANDREL. NO CRACKS WITH 7X MAGNIFICATION. TEST BEGUN JANUARY 1973 ASTM D1171-68
OZONE RESISTANCE:	NO CRACKING AFTER 9 HRS. AT 50 PPHM, 40°C ASTM D-1148
CHEMICAL RESISTANCE:	CRUDE OIL, MANY PETROCHEMICALS, AND ALL PETROLEUM DISTILLATES UP TO 75% AROMATICS. PETROCHEMICALS WITH AROMATICS GREATER THAN 75%, RING STRUCTURE CHEMICALS, AND A FEW OTHER SOLVENTS ALL REQUIRE ULTRASEAL II.



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ULTRASEAL II[®] SPECIFICATIONS

Delivered from Surlyn (Dulmt)

COMPOSITION:	IONOMER CROSS-LINKED CO-POLYMER WITH SPECIAL ADDITIVES FOR STRENGTH, ABRASION RESISTANCE, AND CHEMICAL RESISTANCE.
DESCRIPTION:	BLACK, 100% CLOSED CELL, RESILIENT TAPERED WIPER SEAL APPROXIMATELY 13" WIDE BY 1" THICK AT CLAMP.
WEIGHT:	APPROXIMATELY 0.2 POUNDS/LIN. FT. (0.3 kg/m)
DENSITY:	4 POUNDS/CUBIC FT. (64 kg/m ³)
COMPRESSIVE STRENGTH:	15.2 PSI (1.069 kg/cm ²) 10% DEFLECTION
TENSILE STRENGTH:	105 PSI (7.383 kg/cm ²)
BASHORE RESILIENCE:	46%
FLAME SPREAD:	APPROXIMATELY 2"/MIN.
TEMPERATURE RESISTANCE:	LOW -180°F (-117.8°C) HIGH CONTINUOUS 120°F (48.9°C) HIGH INTERMITTENT 155°F (68.3°C)
WEATHER RESISTANCE:	MOISTURE ABSORPTION 0.4% SENSITIVE TO UV RADIATION DEGRADATION AND THEREFORE NOT RECOMMENDED FOR INSTALLATIONS EXPOSED TO DIRECT SUNLIGHT.
CHEMICAL RESISTANCE:	EXCELLENT FOR MANY CHEMICALS INCLUDING SOLVENTS, PURE AROMATICS SUCH AS BENZENE, ETHERS, KETONES, AND MANY COMMON ALCOHOLS.



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Appendix 17
DuPont Surlyn Technical Information:
Chemical Resistance



DuPont™ Surlyn®

IONOMER RESINS

TECHNICAL INFORMATION: CHEMICAL RESISTANCE

DuPont™ Surlyn® resins have outstanding resistance to both physical and chemical attack. They are also highly resistant to permeation by liquids. However, some aromatic, cyclic, and high eraliphatic hydrocarbon solvents cause swelling and permeate through the resin; therefore, they should be used with caution. The permeation rate of any liquid will vary depending upon the particular grade of resin and wall thickness, as well as the molecular weight and polarity of the liquid.

Note: This report applies to industrial applications for Surlyn® resins and not for flexible packaging applications. Generally, industrial applications involve material thicknesses greater than 20 mil. Flexible packaging applications, by comparison, typically involve thin films and/or thin coatings or laminations to other substrates. The chemical resistance performance of Surlyn® for these thin, flexible packaging applications may be different than indicated in this report.

Chemical environmental effects on Surlyn® resins may be divided into three categories: oxidation, stress cracking, and plasticization. Only oxidation is a chemical degradation; the other two involve the physical properties of the polymer.

Oxidizers

Oxidizers are capable of chemically degrading Surlyn®. The chemical effects of even a strong oxidizer may be gradual and may not be measurable over the short term. However, they may be significant over the long term and should be evaluated if continuous exposure is expected. The following materials are examples of strong oxidizers that are unsuitable for long-term exposure to Surlyn® resin:

- Nitric acid, fuming
- Sulfuric acid, fuming (oleum)
- Aqua regia Chlorine (wet gas)
- Bromine (liquid)

Stress Crack Agents

Certain surface-active materials, although they have no chemical effect, can accelerate the cracking of Surlyn® resins when under stress. This accelerated form of stress failure is called environmental stress cracking (ESC). Although all resins are subject to stress cracking, some are more susceptible to it than others. Certain Surlyn® grades are specially designed to be more resistant to this type of failure.

ESC failure depends on the amount of stress in the resin and, therefore, thermal history and design factors are very important. When designing for known or possible stress crack agents, Surlyn® grade selection and optimum fabrication techniques (i.e., for minimum internal stress) must be considered. The following materials are examples of stress crack agents that are unsuitable for long-term exposure to Surlyn® resin:

- Methyl alcohol
- Ethyl alcohol
- n-Propyl alcohol
- Isopropyl alcohol
- Ethylene glycol

Plasticizers

Certain types of nonaqueous chemicals are absorbed to varying degrees by Surlyn® resins causing swelling, weight gain, softening, and some loss of yield strength. These plasticizing materials cause no actual chemical degradation of the resin. Some organic solvents such as aliphatic hydrocarbons, chlorinated hydrocarbons, aromatics, and heterocyclic compounds have a strong plasticizing action (10–20% solubility in the polymer). However, most of these solvents are sufficiently volatile, so that if they are removed from contact with the resin, the part will "dry out" and return to its original condition with no impairment of properties. Sodium-type resins absorb less of these solvents than zinc types. Conversely, aqueous solutions will plasticize sodium-type resins more than zinc types. If the end product is unsupported, absorption of either aqueous or nonaqueous product will reduce the product stiffness and may change color and increase internal haze.

Testing Is Important

It cannot be expected that one chemical resistance data chart will include the effects of all chemicals. Furthermore, the suitability of Surlyn® depends not only on the nature of the chemical environment, but also on the expected service temperature and stress, the duration of exposure, and whether it is intermittent or continuous.

Because so many variables are involved, it must be recognized that standard laboratory tests can give only a general guide as to whether a resin may resist exposure to a specific environment. Therefore, the feasibility of any chemical environment must be determined by extensive laboratory tests carried out under conditions that approximate as closely as possible those expected in service.

The following procedure is recommended to determine the suitability of Surlyn® to resist a specific chemical exposure:

1. Immerse a sample of the Surlyn® resin in the chemical under study. The sample should be preweighed and immersed at the expected service temperature for a reasonable time.

Note: Many of the chemicals under study may be toxic, corrosive, flammable, and/or irritants. In addition, many of the chemicals under study should not be inhaled, ingested, or come in contact with human skin. Therefore, accepted industrial standards should be used when involved with these chemicals.

2. At the end of the test period, the sample should be reweighed to determine if there is a weight gain or loss. In addition, any change in surface hardness should be noted.
3. Check for chemical degradation of the resin by observing any surface crazing, cracking, or discoloration.
4. Tensile properties should be checked by measuring ultimate tensile strength and elongation. Tensile properties will change with percent plasticization. If chemical attack has occurred, a remarkable decrease in ultimate tensile strength should be evident.
5. Environmental stress cracking characteristics of the chemical under study can be determined using ASTM test procedure D1693 by substituting the chemical of interest for the test liquid specified in this procedure.

Guide to Chemical Resistance

The chemical resistance data presented in the following table originated in part from tests conducted at DuPont laboratories and, in part, from reliable published sources. *This table is intended only as a preliminary, general guide to the resistance of Surlyn® to various chemicals. It should not be used by the industry as the basis for final decisions because the specific end-use application, design, and/or conditions of use may have added effects on performance in a particular chemical environment. It is recommended that laboratory testing of the specific end-use application be conducted under expected service conditions.*

Resistance Code	Caution Code
R Resistant; no indication that serviceability would be impaired.	O Oxidizer P Plasticizer
V Variable resistance, depending on conditions of use.*	A Known stress crack agent ^b
U Not resistant. Not recommended for service applications under any conditions	B Possible stress crack agent ^b

*The classification "variable resistance" is very broad. Depending on the nature of the chemical, its concentration, the service temperature and pressure, and the time of exposure, Surlyn® resin can be either very resistant or very susceptible to attack. Therefore, where Surlyn® is said to have variable resistance to a chemical, it is critical that extensive pretesting be conducted.

^b A system using Surlyn® in exposure to a chemical to which it is designated resistant, but which carries a stress crack identifier (A or B), may be serviceable over a useful lifetime providing the following precautions are observed:

- A stress crack resistant grade of Surlyn® resin should be used.
- Stresses in the fabricated Surlyn® must be minimized by design and processing.
- Conditions and limitations of the application should be carefully observed (avoidance of high temperature, etc.)

Chemical Resistance Data – Surlyn® Resin

Caution Code	Chemical	Chemical Resistance Code		Caution Code	Chemical	Chemical Resistance Code	
		21°C (70°F)	60°C (140°F)			21°C (70°F)	60°C (140°F)
B	Acetaldehyde (100%)	V	U		Beer	R	R
	Acetic Acid (10%)	R	R	B	Beet Sugar Liquors	R	R
B	Acetic Acid (60%)	R	V	B	Benzaldehyde	V	U
	Acetic Anhydride	R	R	P	Benzene	R	V
	Acetone	R	*	P	Benzene Sulfonic Acid (10%)	R	R
	Acrylic Emulsions	R	R		Benzoic Acid	R	R
	Adipic Acid	R	R		Bismuth Carbonate	R	R
	Air	R	R		Black Liquor	R	R
B,P	Allyl Chloride	U	U		Bleach Lye (10%)	R	R
	Aluminum Chloride	R	R		Borax	R	R
	Aluminum Fluoride	R	R		Boric Acid	R	R
	Aluminum Hydroxide	R	R		Brine	R	R
	Aluminum Nitrate	R	R		Bromic Acid	R	V
	Aluminum Oxychloride	R	R	O	Bromine, Liquid	U	U
	Aluminum Sulfate	R	R	O	Bromine, Vapor (25%)	U	U
	Alums (all types)	R	R	O	Bromine, Water	U	U
	Ammonia (100% dry gas)	R	R	P	Butadiene	V	*
	Ammonia, Liquid	R	R	P	Butane	R	*
	Ammonium Acetate	R	R	A	Butanediol	R	V
	Ammonium Carbonate	R	R		Butter	R	R
	Ammonium Chloride	R	R	P	n-Butyl Acetate (100%)	R	V
	Ammonium Fluoride	R	R	A	n-Butyl Alcohol (100%)	V	U
	Ammonium Hydroxide (10-28%)	R	R		Butyric Acid	U	U
	Ammonium Metaphosphate	R	R		Cadmium Cyanide	R	R
	Ammonium Nitrate	R	R		Calcium Bisulfite	R	R
	Ammonium Persulfate	R	R		Calcium Bisulfide	R	R
	Ammonium Phosphate, Ammoniacal and Neutral	R	R		Calcium Carbonate	R	R
	Ammonium Sulfide	R	R		Calcium Chlorate	R	R
	Ammonium Sulfate	R	R		Calcium Chloride	R	R
	Ammonium Thiocyanate	R	R		Calcium Hydroxide	R	R
B,P	Amyl Acetate (100%)	U	U	B	Calcium Hydroxide (bleach solution)	V	V
A,P	Amyl Alcohol (100%)	V	V		Calcium Nitrate (50%)	R	R
P	Amyl Chloride (100%)	U	U		Calcium Oxide	R	R
P	Aniline (100%)	R	U		Calcium Sulfate	R	R
P	Aniline Hydrochloride	U	U	B,P	Camphor Oil	U	U
	Anthraquinone	R	R		Carbon (slurry)	R	R
	Anthraquinone Sulfonic Acid	R	R		Carbon Dioxide	R	R
	Antimony Trichloride	R	R		Carbon Disulfide	U	U
O	Aqua Regia	U	U		Carbon Monoxide	R	R
P	Aromatic Hydrocarbons	R	V	P	Carbon Tetrachloride	U	U
	Arsenic Acid	R	R		Carbonic Acid	R	R
	Ascorbic Acid (10%)	R	R		Castor Oil	R	R
	Barium Carbonate	R	R		Caustic Potash	R	R
	Barium Chloride	R	R		Caustic Soda	R	R
	Barium Hydroxide	R	R	P	Cellosolve	R	U
	Barium Sulfate	R	R	P	Chloralhydrate	U	U
	Barium Sulfide	R	R	O	Chlorine (100% dry gas)	U	U
				O	Chlorine (wet gas)	U	U
				O	Chlorine Liquid	U	U

V – Variable resistance U – Not resistant * – Insufficient data

Refer to text for explanation of Resistance and Caution Codes.

Chemical Resistance Data – Surlyn® Resin

Caution Code	Chemical	Chemical Resistance Code	
		21°C (70°F)	60°C (140°F)
B	Chlorine Water (2%)	R	V
P	Chlorobenzene	U	U
P	Chloroform	U	U
	Chlorosulfonic Acid (100%)	U	U
	Chromic Acid (10%)	R	*
O	Chromic Acid (30—50%)	R	*
	Cider	R	R
	Citric Acid	R	R
A	Coconut Oil Alcohols	R	V
	Coffee	R	R
	Cola Concentrates	R	R
	Copper Carbonate	R	R
	Copper Chloride	R	R
	Copper Cyanide	R	R
	Copper Fluoride (2%)	R	R
	Copper Nitrate	R	R
	Copper Sulfate	R	R
	Corn Oil	R	R
	Corn Syrup	R	R
P	Cottonseed Oil	R	R
P	Cresol	U	U
	Crude Oil	R	R
	Cupric Fluoride	R	R
	Cupric Sulfate	R	R
	Cuprous Chloride	R	R
B	Cyclohexanol	R	V
P	Cyclohexanone	R	U
B	Detergents, Synthetic	R	R
	Developers, Photographic	R	R
	Dextrin	R	R
	Dextrose	R	R
	Diazo Salts	R	R
	Dibutylphthalate	R	V
B,P	Dichlorobenzene (o & p)	U	U
B	Diethyl Ketone	V	U
A	Diethylene Glycol	R	V
A	Diglycolic Acid	R	R
	Dimethylamine	U	U
P	Diethylphthalate	R	U
	Disodium Phosphate	R	R
	Distilled Water	R	R
P	Esters	R	V
P	Ethers	R	V
P	Ethyl Acetate (100%)	R	U
P	Ethyl Acrylate	R	V
A	Ethyl Alcohol	V	U
B,P	Ethyl Benzene	U	U
P	Ethyl Chloride	U	U
P	Ethyl Ether	U	U
B,P	Ethylene Bromide	U	U
B,P	Ethylene Chloride	U	U
B,P	Ethylene Chlorohydrin	U	U
B,P	Ethylene Dichloride	U	U
A	Ethylene Glycol	V	U
	Ethylene Oxide	R	V
	Ferric Chloride	R	R
	Ferric Hydroxide	R	R
	Ferric Nitrate	R	R
	Ferric Sulfate	R	R
	Ferrous Chloride	R	R
	Ferrous Sulfate	R	R
	Fish Solubles	R	R
	Fluoboric Acid	R	R
O	Fluorine, Gas, Wet	U	U
	Fluosilicic Acid (conc.)	R	V
	Fluosilicic Acid (32%)	R	R
B	Formaldehyde	R	V
	Formic Acid	R	R
	Fructose	R	R
B	Fruit Pulp	R	R
P	Furfural (100%)	U	U
B,P	Furfuryl Alcohol	U	U
B	Gallic Acid	R	R
P	Gas, Natural, Dry and Wet	R	*
P	Gasoline	R	V
P	Gasoline, High Octane	R	V
P	Genetron, 11, 12 & 22	R	*
	Glucose R	R	R
B	Glycerine	R	R
A	Glycol	V	U
A	Glycolic Acid (30%)	R	R
	Grape Sugar (sat. aq.)	R	R
P	n-Heptane	R	V
	Hexachlorobenzene	R	R
P	Hexane	R	V
B	Hexanol, Tertiary	R	R
*	Hydrobromic Acid (50%)	R	R
	Hydrochloric Acid	R	R
	Hydrocyanic Acid	R	R
*	Hydrofluoric Acid (40–60%)	R	R
	Hydrogen (100%)	R	R
	Hydrogen Chloride (dry gas)	R	R
	Hydrogen Peroxide (3%)	R	V
	Hydrogen Sulfide	R	R
	Hydroquinone	R	R
	Hydroxylamine Sulfate	R	R
	Hypochlorous Acid	R	R
B	Inks	R	R
O	Iodine (in KI solution)	U	U
A	Isopropyl Alcohol	V	U
P	Jet Fuels, JP4 and JP5	V	U
P	Kerosene	V	U
	Kraft Liquors	R	R
	Lactic Acid (25%)	R	R
	Lard Oil	R	R
	Latex	R	R
	Lauric Acid	R	V
P	Lauryl Chloride	V	*

V -- Variable resistance U – Not resistant * -- Insufficient data Refer to text for explanation of Resistance and Caution Codes.

Chemical Resistance Data – Surlyn® Resin

Caution Code	Chemical	Chemical Resistance Code	
		21°C (70°F)	60°C (140°F)
	Lead Acetate	R	R
	Lead Chloride	R	R
	Lead Nitrate	R	R
	Lead Sulfate	R	R
P	Linseed Oil	V	U
	Lithium Bromide	R	R
P	Lubricating Oil, ASTM #1, #2, #3	R	V
P	Machine Oil	R	V
	Magnesium Carbonate	R	R
	Magnesium Chloride	R	R
	Magnesium Citrate	R	R
	Magnesium Hydroxide	R	R
	Magnesium Nitrate	R	R
	Magnesium Sulfate	R	R
	Maleic Acid	R	R
	Mercuric Chloride	R	R
	Mercuric Cyanide	R	R
	Mercurous Nitrate	R	R
	Mercury		
P	Methane	R	*
A	Methyl Alcohol	V	U
P	Methyl Chloride	U	U
P	Methyl Ethyl Ketone	R	V
P	Methyl Isobutyl Ketone	R	V
	Methyl Sulfate	R	R
B,P	Methyl Sulfuric Acid	R	R
	Methylene Chloride (100%)	U	U
	Milk	R	R
	Mineral Oils	R	V
	Molasses	R	R
P	Naptha	V	U
P	Napthalene	U	U
	Nickel Chloride	R	R
	Nickel Nitrate	R	R
	Nickel Sulfate	R	R
B	Nicotine (dilute)	R	R
	Nitric Acid (0–10%)	R	V
O	Nitric Acid (10–98%)	U	U
O	Nitric Acid, fuming	U	U
P	Nitrobenzene (100%)	U	U
P	Nitrous Oxide	R	*
P	n-Octane	R	R
P	Oleic Acid	U	U
	Oxalic Acid	R	R
O	Oxygen	R	V
O	Ozone	R	*
O	Perchloric Acid (10–70%)	U	U
P	Perchloroethylene	R	U
P	Phenol	U	U
P	Phenylhydrazine	U	U
P	Phenylhydrazine Hydrochloride	U	U
	Phosphoric Acid	R	R
	Photographic Solutions	R	R
O	Picric Acid	U	U
	Plating Solutions		
	Brass	R	R
	Cadmium	R	R
	Copper	R	R
	Gold	R	R
	Lead	R	R
	Nickel	R	R
	Silver	R	R
	Tin	R	R
	Zinc	R	R
	Potassium Bicarbonate	R	R
	Potassium Bichromate	R	R
	Potassium Borate	R	R
	Potassium Bromate	R	R
	Potassium Bromide	R	R
	Potassium Carbonate	R	R
	Potassium Chlorate	R	R
	Potassium Chloride	R	R
	Potassium Chromate (40%)	R	R
	Potassium Cyanide	R	R
	Potassium Dichromate (40%)	R	R
	Potassium Ferri/ Ferro Cyanide	R	R
	Potassium Fluoride	R	R
	Potassium Hydroxide	R	R
	Potassium Nitrate	R	R
	Potassium Perborate	R	R
	Potassium Perchlorate (10%)	R	R
	Potassium Permanganate (20%)	R	R
	Potassium Persulfate	R	R
	Potassium Sulfate	R	R
	Potassium Sulfide	R	R
	Potassium Sulfite	R	R
P	Propane	U	U
A	Propargyl Alcohol	R	V
A	n-Propyl Alcohol	V	U
P	Propylene Dichloride (100%)	U	U
A	Propylene Glycol	R	V
	Pyridine	R	U
	Resorcinol	R	R
	Salicylic Acid	R	R
	Sea Water	R	R
	Selenic Acid	R	R
	Sewage	R	R
	Shortening	R	R
	Silicic Acid	R	R
	Silver Cyanide	R	R
	Silver Nitrate Solution	R	R
	Silver Sulfate	R	R
	Soap Solution	R	R

V -- Variable resistance U – Not resistant * -- Insufficient data Refer to text for explanation of Resistance and Caution Codes.

Chemical Resistance Data – Surlyn® Resin

Caution Code	Chemical	Chemical Resistance Code		Caution Code	Chemical	Chemical Resistance Code	
		21°C (70°F)	60°C (140°F)			21°C (70°F)	60°C (140°F)
	Sodium Acetate	R	R	P	Thionyl Chloride	U	U
	Sodium Benzoate (35%)	R	R		Titanium Tetrachloride	U	U
	Sodium Bicarbonate	R	R	P	Toluene	U	U
	Sodium Bisulfate	R	R	P	Tributylphosphate	V	V
	Sodium Bisulfite	R	R	P	Trichloroethylene	U	U
	Sodium Borate	R	R	B	Triethylene Glycol	R	V
	Sodium Bromide (dilute)	R	R		Trisodium Phosphate	R	R
	Sodium Carbonate	R	R	P	Turpentine	V	U
	Sodium Chlorate	R	R		Urea (0–30%)	R	R
	Sodium Chloride	R	R		Urine	R	R
	Sodium Cyanide	R	R	A	Vanilla Extract	R	V
	Sodium Dichromate	R	R		Vinegar	R	R
	Sodium Ferri/Ferro Cyanide	R	R	P	Vinyl Acetate	V	*
	Sodium Fluoride	R	R		Water	R	R
	Sodium Hydroxide	R	R		Water, Acid Mine	R	R
B	Sodium Hypochlorite	R	V		Water, Salt and Sea	R	R
	Sodium Nitrate	R	R		Wetting Agents	R	R
	Sodium Nitrite	R	R	A	Whiskey	R	V
O	Sodium Peroxide	R	*	B	Wines	R	V
	Sodium Sulfate	R	R	P	Xylene	R	V
	Sodium Sulfide	R	R		Yeast	R	R
	Sodium Sulfite	R	R		Zinc Bromide	R	R
P	Sour Crude Oil	R	V		Zinc Carbonate	R	R
	Stannic Chloride	R	R		Zinc Chloride	R	R
	Stannous Chloride	R	R		Zinc Nitrate	R	R
	Starch Solution	R	R		Zinc Oxide	R	R
	Stearic Acid (100%)	R	R		Zinc Stearate	R	R
P	Stoddards Solvent	R	V		Zinc Sulfate	R	R
	Sulfur	R	R				
	Sulfur Dioxide, Dry or Wet	R	V				
	Sulfuric Acid (0–30%)	R	R				
O	Sulfuric Acid (30–98%)	U	U				
O	Sulfuric Acid, fuming (oleum)	U	U				
	Sulfurous Acid	R	R				
P	Tallow	R	V				
	Tannic Acid	R	R				
	Tanning Liquors	R	R				
	Tartaric Acid	R	R				
P	Tetrahydrofuran	U	U				

V -- Variable resistance U – Not resistant * -- Insufficient data Refer to text for explanation of Resistance and Caution Codes.

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Fax: +1 302 355 4056

DuPont do Brasil, S.A.
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Fax: +55 11 4166 8736

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Fax: +86 21 3862 2889

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www.surlyn.dupont.com

The technical data contained herein are guides to the use of DuPont resins. The advice contained herein is based upon tests and information believed to be reliable, but users should not rely upon it absolutely for specific applications because performance properties will vary with processing conditions. It is given and accepted at user's risk and confirmation of its validity and suitability in particular cases should be obtained independently. The DuPont Company makes no guarantees of results and assumes no obligations or liability in connection with its advice. This publication is not to be taken as a license to operate under, or recommendation to infringe any patents.

CAUTION: Do not use in medical applications involving permanent implantation in the human body. For other medical applications, see DuPont Medical Caution Statement, H-50102.

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Appendix 18
2017 LDEQ Inspection Report, selected pages
Title V Deviation Report 1H 2015
VTAP LDAR Report 1H 2015

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
CAPITAL REGIONAL OFFICE ROUTING FORM**

Routing Date: 3/14/2018

Facility Information

Company Name: LBC Baton Rouge, LLC

Facility Site Name: Sunshine Terminal

Agency Interest No: 3492

Alt. ID No:

Mailing Address 11666

Physical Address 1725

Street: Port Road

Street: Hwy 75

City, State, Zip: Seabrook, TX, 70780

City, Parish: Sunshine, Iberville

Responsible Party/Contact Person: Danielle Bush

Responsible Party/Contact Person Telephone No: 281-291-3418

Inspection/Referral Information

Inspection Date: 8/16/2017 and 9/21/2017 **Hours Spent On Inspection/Report:** ~20

Media: Check all that apply

Air (inc. asbestos/lead): ☒ Water: ☐ Haz. Waste: ☐

Solid Waste (inc. tires): ☐

Complaint? ☐ Yes ☒ No **Follow up?** ☐ Yes ☒ No *If yes*

Enforcement Action Number

Inspector/Team Leader Name: Bradley Gauthier

Inspector/Team Leader Contact No.: 225-219-3340

**Approved By
Supervisor:**

Shen L. Courtney

Date:

3/18/18

**Approved By
DCL:**

Jim L. [Signature]

Date:

3/19/2018

**Approved by
Manager:**

Bobby G. Mayweather

Date

3/20/2018 ENF

LBC Baton Rouge, LLC – Sunshine Terminal
8/16/2017 & 9/21/2017

AI# 3492

- The facility failed to conduct annual external IFR inspections on December 31, 2014 for tanks 55-6, 55-8, 55-10, 55-11, 55-13, 80-1, 80-2, 80-6, 80-7, and 80-9. The inspections were conducted on January 6, 2015. The associated Emission Source was PCS0010. The deviation was reported in the 2014 Annual Compliance Certification Report dated March 6, 2015.
- A release of EHC 65 occurred due to a leak in a dock transfer hose. The release occurred on May 7, 2015 from 2:21 pm to 2:28 pm. The associated Emission Source was EQT0040. The release was reported in the 2015 1st Semiannual Monitoring Report dated July 31, 2015
- A release of VGO occurred due to a leak in a transfer pipe. The release occurred on May 29, 2015 from 12:45 pm to 12:53 pm. The associated Emission Source was UNF0001. The release was reported in the 2015 1st Semiannual Monitoring Report dated July 31, 2015.
- A release of Benzene occurred due to a leak in a pump seal. The release occurred on June 25, 2015 from 6:02 am to 6:03 am. The associated Emission Source was EQT0074. The release was reported in the 2015 1st Semiannual Monitoring Report dated July 31, 2015.
- Around June 12, 2015, the Permits Division referred the facility to Enforcement for the following: the facility failed to submit the 2014 Annual Criteria Pollutant Emission Inventory in a timely and complete manner (LAC 33:III.919.F.1.d) and the Department did not receive the 2014 Annual Toxic Emission Inventory as required (LAC 33:III.5107.A).

As a result of these areas of concern, the facility was referred the Department's Enforcement Division on 12/21/2016.

There are no past enforcement actions issued to the facility relative to the media air.



July 31, 2015

7014120000218356873

LDEQ
Title V Program
Office of Environmental Compliance
Enforcement Division
P.O. Box 4312
Baton Rouge, LA 70821-4312

RE: Title V Semiannual Monitoring Form
LBC Baton Rouge, LLC
Permit No.: 1280-00025-V7
AI No.: 3492

Dear Sir or Madam:

Enclosed is a completed "Louisiana DEQ Title V Semiannual Monitoring Form" for the referenced permit at LBC Baton Rouge, LLC's Sunshine Terminal, located at 1725 Hwy 75, Sunshine, LA. This report covers the period from January 1, 2015 to June 30, 2015, and is also intended to serve as the quarterly deviation report for the period from April 1, 2015 to June 30, 2015.

Please contact me at (281) 291-3418, or d-bush@lbctt.com if you have any questions or require additional information.

Sincerely,

A handwritten signature in blue ink that reads "Danielle L. Bush". The signature is fluid and cursive, with the first name being the most prominent.

Danielle L. Bush
Regional Manager, Environmental Compliance

Enclosure: Louisiana DEQ Title V Semiannual Monitoring Form

c: 7014120000218356866
Capital Regional Office
P.O. Box 4312
Baton Rouge, LA 70821-4312

LBC Houston-Baton Rouge

Bayport Terminal
Bayport Industrial Complex
11666 Port Road
Seabrook, Texas 77586-USA

Corporate Office USA
Phone: (281) 474-4433
Fax: (281) 291-3428

www.lbctt.com



Louisiana DEQ Title V Semiannual Monitoring Form (Facility Identification)

Applicable Reporting Period: 01/01/15 to 06/30/15
mm/dd/yy mm/dd/yy

Company and Facility Identification					
Permit Number	1280-00025-V7	Parish	Iberville	Date Permit Issued	12/30/14
Company Name	LBC Baton Rouge, LLC				
Facility Name	Sunshine Terminal			Agency Interest Number	3492
Mailing Address	11666 Port Road				
City	Seabrook	State	Texas	Zip Code	77586
Contact Person	Danielle Bush	Phone #	281-291-3418	Fax #	281-749-8239
Principal Facility Product/Business	Bulk Liquid Terminal				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)			
Responsible Official (typed)	John Grimes	Date	7/29/15
Responsible Official Title	Director of Operations		



Louisiana DEQ Title V Semiannual Monitoring Form

Deviation Reporting

Title V Permit Number: 1280-00025-V7 **Company Name:** LBC Baton Rouge, LLC

Facility Name: Sunshine Terminal **AI Number:** 3492

Question	Response (Yes/No)	If the deviations have been previously reported, please reference below the report and date of the report.
Are there any instances of deviation from permit requirements being reported with this semiannual monitoring report? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report."	Yes	This report is also intended to serve as the 2 nd Quarter deviation report.

- * As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in the "Deviation Summary Report."



Louisiana DEQ Title V Semiannual Monitoring Form

Deviation Summary Report

Title V Permit Number: 1280-00025-V7 Company Name: LBC Baton Rouge, LLC

Facility Name: Sunshine Terminal AI Number: 3492

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT0040	VOC	741	LAC 33:III.501.C.6	Records Review	NA
UNF0001	VOC	741	LAC 33:III.501.C.6	Records Review	NA
EQT0074	Benzene	741	LAC 33:III.501.C.6	Records Review	NA



Louisiana DEQ Title V Semiannual Monitoring Form

Deviation Summary Report (Continued)

Title V Permit Number: 1280-00025-V7 **Company Name:** LBC Baton Rouge, LLC

Facility Name: Sunshine Terminal **AI Number:** 3492

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Deviation/ Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			
EQT0040	5/7/15	14:21	5/7/15	14:28	0.11	Release of less than reportable quantity of EHC 65 due to leak in dock transfer hose.	Release was contained and necessary cleanup actions were undertaken.
UNF0001	5/29/15	12:45	5/29/15	12:53	0.13	Release of less than reportable quantity of VGO due to leak in transfer pipe.	Release was contained and necessary cleanup actions were undertaken.
EQT0074	6/25/15	06:02	6/25/15	06:03	0.02	Release of less than reportable quantity of Benzene due to leak in pump seal.	Release was contained and necessary cleanup actions were undertaken.



DEQ - OES
2015 AUG -5 PM 12:47

July 31, 2015

Louisiana Dept. of Env. Quality
Office of Environmental Assessment
P.O. Box 4314
Baton Rouge, LA 70821-4314

RECEIVED
AUG 26 2015
LDEQ/OEC
ENFORCEMENT DIVISION

RE: LBC Baton Rouge LLC, Agency Interest # 3492
VTAP Fugitive Emissions Control Program Semi-Annual Report

Dear Sir or Madam,

Enclosed is LBC Baton Rouge LLC's semi-annual report for VTAP Fugitive Emissions control for the period covering January 01, 2015 – June 30, 2015.

This report covers units 55-4 through 55-11, 55-13, 80-1, 80-2 and 80-6 through 80-9 and the Marine Vapor Control System.

If you have any questions or need further information please contact me at (281) 291-3418 or d-bush@lbctt.com.

Sincerely,

A handwritten signature in blue ink that reads "Danielle L. Bush". The signature is fluid and cursive, with the first name "Danielle" being more prominent.

Danielle L. Bush
Regional Manager, Environmental Compliance

LBC Houston-Baton Rouge

Bayport Terminal
Bayport Industrial Complex
11666 Port Road
Seabrook, Texas 77586-USA

Corporate Office USA
Phone: (281) 474-4433
Fax: (281) 291-3428

www.lbctt.com

**SEMI-ANNUAL REPORT
VTAP FUGITIVE EMISSIONS CONTROL
LBC BATON ROUGE LLC**

UNIT I.D.: <u>Storage Tank 55-4</u>				
HAZARDOUS COMPONENT: <u>Benzene</u>				
REPORTING PERIOD: <u>January 01, 2015 - June 30, 2015</u>				
SHUTDOWN DATES DURING REPORTING PERIOD: <u>As Indicated</u>				
RESULTS:	1st Qtr. 2015	2nd Qtr. 2015		
<u>VALVES:</u>				
Number of valves in unit	@	@		
Number of valve leaks detected	@	@		
% Valves leaking	@	@		
Number of valve leaks detected and NOT repaired*	@	@		
<u>PUMPS:</u>				
Number of pumps in unit	@	@		
Number of pump leaks detected	@	@		
Number of pump leaks detected and NOT repaired (*)	@	@		
<u>COMPRESSORS:</u>				
Number of compressors in unit	@	@		
Number of compressor leaks detected	@	@		
Number of compressor leaks detected and NOT repaired (*)	@	@		
<u>PRESSURE SAFETY VALVES:</u>				
Number of PSV's in Unit	@	@		
Number of PSV leaks detected	@	@		
Number of PSV leaks detected and NOT repaired (*)	@	@		

@ NOT IN BENZENE SERVICE DURING REPORTING PERIOD

(*) Attach required statement signed by responsible authority giving reason for not complying.

**SEMI-ANNUAL REPORT
VTAP FUGITIVE EMISSIONS CONTROL
LBC BATON ROUGE LLC**

UNIT I.D.: <u>Storage Tank 55-5</u>				
HAZARDOUS COMPONENT: <u>Benzene</u>				
REPORTING PERIOD: <u>January 01, 2015 - June 30, 2015</u>				
SHUTDOWN DATES DURING REPORTING PERIOD: <u>As Indicated</u>				
RESULTS:	1st Qtr. 2015	2nd Qtr. 2015		
<u>VALVES:</u>				
Number of valves in unit	@	@		
Number of valve leaks detected	@	@		
% Valves leaking	@	@		
Number of valve leaks detected and NOT repaired*	@	@		
<u>PUMPS:</u>				
Number of pumps in unit	@	@		
Number of pump leaks detected	@	@		
Number of pump leaks detected and NOT repaired (*)	@	@		
<u>COMPRESSORS:</u>				
Number of compressors in unit	@	@		
Number of compressor leaks detected	@	@		
Number of compressor leaks detected and NOT repaired (*)	@	@		
<u>PRESSURE SAFETY VALVES:</u>				
Number of PSV's in Unit	@	@		
Number of PSV leaks detected	@	@		
Number of PSV leaks detected and NOT repaired (*)	@	@		

@ NOT IN BENZENE SERVICE DURING REPORTING PERIOD

(*) Attach required statement signed by responsible authority giving reason for not complying.

**SEMI-ANNUAL REPORT
VTAP FUGITIVE EMISSIONS CONTROL
LBC BATON ROUGE LLC**

UNIT I.D.: <u>Storage Tank 55-6</u>				
HAZARDOUS COMPONENT: <u>Benzene</u>				
REPORTING PERIOD: <u>January 01, 2015 - June 30, 2015</u>				
SHUTDOWN DATES DURING REPORTING PERIOD: <u>As Indicated</u>				
RESULTS:	1st Qtr. 2015	2nd Qtr. 2015		
<u>VALVES:</u>				
Number of valves in unit	31	31		
Number of valve leaks detected	0	0		
% Valves leaking	0	0		
Number of valve leaks detected and NOT repaired*	0	0		
<u>PUMPS:</u>				
Number of pumps in unit	2	2		
Number of pump leaks detected	0	0		
Number of pump leaks detected and NOT repaired (*)	0	0		
<u>COMPRESSORS:</u>				
Number of compressors in unit	0	0		
Number of compressor leaks detected	0	0		
Number of compressor leaks detected and NOT repaired (*)	0	0		
<u>PRESSURE SAFETY VALVES:</u>				
<i>Number of PSV's in Unit</i>	0	0		
<i>Number of PSV leaks detected</i>	0	0		
<i>Number of PSV leaks detected and NOT repaired (*)</i>	0	0		

@ **NOT IN BENZENE SERVICE DURING REPORTING PERIOD**

(*) Attach required statement signed by responsible authority giving reason for not complying.

**SEMI-ANNUAL REPORT
VTAP FUGITIVE EMISSIONS CONTROL
LBC BATON ROUGE LLC**

UNIT I.D.: <u>Storage Tank 55-7</u>				
HAZARDOUS COMPONENT: <u>Benzene</u>				
REPORTING PERIOD: <u>January 01, 2015 - June 30, 2015</u>				
SHUTDOWN DATES DURING REPORTING PERIOD: <u>As Indicated</u>				
RESULTS:	1st Qtr. 2015	2nd Qtr. 2015		
<u>VALVES:</u>				
Number of valves in unit	@	@		
Number of valve leaks detected	@	@		
% Valves leaking	@	@		
Number of valve leaks detected and NOT repaired*	@	@		
<u>PUMPS:</u>				
Number of pumps in unit	@	@		
Number of pump leaks detected	@	@		
Number of pump leaks detected and NOT repaired (*)	@	@		
<u>COMPRESSORS:</u>				
Number of compressors in unit	@	@		
Number of compressor leaks detected	@	@		
Number of compressor leaks detected and NOT repaired (*)	@	@		
<u>PRESSURE SAFETY VALVES:</u>				
Number of PSV's in Unit	@	@		
Number of PSV leaks detected	@	@		
Number of PSV leaks detected and NOT repaired (*)	@	@		

@ NOT IN BENZENE SERVICE DURING REPORTING PERIOD

(*) Attach required statement signed by responsible authority giving reason for not complying.

**SEMI-ANNUAL REPORT
VTAP FUGITIVE EMISSIONS CONTROL
LBC BATON ROUGE LLC**

UNIT I.D.: <u>Storage Tank 55-8</u>				
HAZARDOUS COMPONENT: <u>Benzene</u>				
REPORTING PERIOD: <u>January 01, 2015 - June 30, 2015</u>				
SHUTDOWN DATES DURING REPORTING PERIOD: <u>As Indicated</u>				
RESULTS:	1st Qtr. 2015	2nd Qtr. 2015		
<u>VALVES:</u>				
Number of valves in unit	@	@		
Number of valve leaks detected	@	@		
% Valves leaking	@	@		
Number of valve leaks detected and NOT repaired*	@	@		
<u>PUMPS:</u>				
Number of pumps in unit	@	@		
Number of pump leaks detected	@	@		
Number of pump leaks detected and NOT repaired (*)	@	@		
<u>COMPRESSORS:</u>				
Number of compressors in unit	@	@		
Number of compressor leaks detected	@	@		
Number of compressor leaks detected and NOT repaired (*)	@	@		
<u>PRESSURE SAFETY VALVES:</u>				
Number of PSV's in Unit	@	@		
Number of PSV leaks detected	@	@		
Number of PSV leaks detected and NOT repaired (*)	@	@		

@ NOT IN BENZENE SERVICE DURING REPORTING PERIOD

(*) Attach required statement signed by responsible authority giving reason for not complying.

**SEMI-ANNUAL REPORT
VTAP FUGITIVE EMISSIONS CONTROL
LBC BATON ROUGE LLC**

UNIT I.D.: <u>Storage Tank 55-9</u>				
HAZARDOUS COMPONENT: <u>Benzene</u>				
REPORTING PERIOD: <u>January 01, 2015 - June 30, 2015</u>				
SHUTDOWN DATES DURING REPORTING PERIOD: <u>As Indicated</u>				
RESULTS:	1st Qtr. 2015	2nd Qtr. 2015		
<u>VALVES:</u>				
Number of valves in unit	@	@		
Number of valve leaks detected	@	@		
% Valves leaking	@	@		
Number of valve leaks detected and NOT repaired*	@	@		
<u>PUMPS:</u>				
Number of pumps in unit	@	@		
Number of pump leaks detected	@	@		
Number of pump leaks detected and NOT repaired (*)	@	@		
<u>COMPRESSORS:</u>				
Number of compressors in unit	@	@		
Number of compressor leaks detected	@	@		
Number of compressor leaks detected and NOT repaired (*)	@	@		
<u>PRESSURE SAFETY VALVES:</u>				
Number of PSV's in Unit	@	@		
Number of PSV leaks detected	@	@		
Number of PSV leaks detected and NOT repaired (*)	@	@		

@ NOT IN BENZENE SERVICE DURING REPORTING PERIOD

(*) Attach required statement signed by responsible authority giving reason for not complying.

**SEMI-ANNUAL REPORT
VTAP FUGITIVE EMISSIONS CONTROL
LBC BATON ROUGE LLC**

UNIT I.D.: <u>Storage Tank 55-10</u>				
HAZARDOUS COMPONENT: <u>Benzene</u>				
REPORTING PERIOD: <u>January 01, 2015 - June 30, 2015</u>				
SHUTDOWN DATES DURING REPORTING PERIOD: <u>As Indicated</u>				
RESULTS:	1st Qtr. 2015	2nd Qtr. 2015		
<u>VALVES:</u>				
Number of valves in unit	12	12		
Number of valve leaks detected	0	0		
% Valves leaking	0	0		
Number of valve leaks detected and NOT repaired*	0	0		
<u>PUMPS:</u>				
Number of pumps in unit	0	0		
Number of pump leaks detected	0	0		
Number of pump leaks detected and NOT repaired (*)	0	0		
<u>COMPRESSORS:</u>				
Number of compressors in unit	0	0		
Number of compressor leaks detected	0	0		
Number of compressor leaks detected and NOT repaired (*)	0	0		
<u>PRESSURE SAFETY VALVES:</u>				
Number of PSV's in Unit	0	0		
Number of PSV leaks detected	0	0		
Number of PSV leaks detected and NOT repaired (*)	0	0		

@ NOT IN BENZENE SERVICE DURING REPORTING PERIOD

(*) Attach required statement signed by responsible authority giving reason for not complying.

**SEMI-ANNUAL REPORT
VTAP FUGITIVE EMISSIONS CONTROL
LBC BATON ROUGE LLC**

UNIT I.D.: <u>Storage Tank 55-11</u>				
HAZARDOUS COMPONENT: <u>Benzene</u>				
REPORTING PERIOD: <u>January 01, 2015 - June 30, 2015</u>				
SHUTDOWN DATES DURING REPORTING PERIOD: <u>As Indicated</u>				
RESULTS:	1st Qtr. 2015	2nd Qtr. 2015		
<u>VALVES:</u>				
Number of valves in unit	29	29		
Number of valve leaks detected	0	0		
% Valves leaking	0	0		
Number of valve leaks detected and NOT repaired*	0	0		
<u>PUMPS:</u>				
Number of pumps in unit	0	0		
Number of pump leaks detected	0	0		
Number of pump leaks detected and NOT repaired (*)	0	0		
<u>COMPRESSORS:</u>				
Number of compressors in unit	0	0		
Number of compressor leaks detected	0	0		
Number of compressor leaks detected and NOT repaired (*)	0	0		
<u>PRESSURE SAFETY VALVES:</u>				
Number of PSV's in Unit	0	0		
Number of PSV leaks detected	0	0		
Number of PSV leaks detected and NOT repaired (*)	0	0		

@ NOT IN BENZENE SERVICE DURING REPORTING PERIOD

(*) Attach required statement signed by responsible authority giving reason for not complying.

**SEMI-ANNUAL REPORT
VTAP FUGITIVE EMISSIONS CONTROL
LBC BATON ROUGE LLC**

UNIT I.D.: <u>Storage Tank 55-13</u>				
HAZARDOUS COMPONENT: <u>Benzene</u>				
REPORTING PERIOD: <u>January 01, 2015 - June 30, 2015</u>				
SHUTDOWN DATES DURING REPORTING PERIOD: <u>As Indicated</u>				
RESULTS:	1st Qtr. 2015	2nd Qtr. 2015		
<u>VALVES:</u>				
Number of valves in unit	9	9		
Number of valve leaks detected	0	0		
% Valves leaking	0	0		
Number of valve leaks detected and NOT repaired*	0	0		
<u>PUMPS:</u>				
Number of pumps in unit	0	0		
Number of pump leaks detected	0	0		
Number of pump leaks detected and NOT repaired (*)	0	0		
<u>COMPRESSORS:</u>				
Number of compressors in unit	0	0		
Number of compressor leaks detected	0	0		
Number of compressor leaks detected and NOT repaired (*)	0	0		
<u>PRESSURE SAFETY VALVES:</u>				
Number of PSV's in Unit	0	0		
Number of PSV leaks detected	0	0		
Number of PSV leaks detected and NOT repaired (*)	0	0		

@ NOT IN BENZENE SERVICE DURING REPORTING PERIOD

(*) Attach required statement signed by responsible authority giving reason for not complying.

**SEMI-ANNUAL REPORT
VTAP FUGITIVE EMISSIONS CONTROL
LBC BATON ROUGE LLC**

UNIT I.D.: <u>Storage Tank 80-6</u>				
HAZARDOUS COMPONENT: <u>Benzene</u>				
REPORTING PERIOD: <u>January 01, 2015 - June 30, 2015</u>				
SHUTDOWN DATES DURING REPORTING PERIOD: <u>As Indicated</u>				
RESULTS:	1st Qtr. 2015	2nd Qtr. 2015		
<u>VALVES:</u>				
Number of valves in unit	29	29		
Number of valve leaks detected	0	0		
% Valves leaking	0	0		
Number of valve leaks detected and NOT repaired*	0	0		
<u>PUMPS:</u>				
Number of pumps in unit	1	1		
Number of pump leaks detected	0	0		
Number of pump leaks detected and NOT repaired (*)	0	0		
<u>COMPRESSORS:</u>				
Number of compressors in unit	0	0		
Number of compressor leaks detected	0	0		
Number of compressor leaks detected and NOT repaired (*)	0	0		
<u>PRESSURE SAFETY VALVES:</u>				
Number of PSV's in Unit	0	0		
Number of PSV leaks detected	0	0		
Number of PSV leaks detected and NOT repaired (*)	0	0		

@ NOT IN BENZENE SERVICE DURING REPORTING PERIOD

(*) Attach required statement signed by responsible authority giving reason for not complying.

**SEMI-ANNUAL REPORT
VTAP FUGITIVE EMISSIONS CONTROL
LBC BATON ROUGE LLC**

UNIT I.D.: <u>Storage Tank 80-7</u>				
HAZARDOUS COMPONENT: <u>Benzene</u>				
REPORTING PERIOD: <u>January 01, 2015 - June 30, 2015</u>				
SHUTDOWN DATES DURING REPORTING PERIOD: <u>As Indicated</u>				
RESULTS:	1st Qtr. 2015	2nd Qtr. 2015		
<u>VALVES:</u>				
Number of valves in unit	11	11		
Number of valve leaks detected	0	0		
% Valves leaking	0	0		
Number of valve leaks detected and NOT repaired*	0	0		
<u>PUMPS:</u>				
Number of pumps in unit	0	0		
Number of pump leaks detected	0	0		
Number of pump leaks detected and NOT repaired (*)	0	0		
<u>COMPRESSORS:</u>				
Number of compressors in unit	0	0		
Number of compressor leaks detected	0	0		
Number of compressor leaks detected and NOT repaired (*)	0	0		
<u>PRESSURE SAFETY VALVES:</u>				
Number of PSV's in Unit	0	0		
Number of PSV leaks detected	0	0		
Number of PSV leaks detected and NOT repaired (*)	0	0		

@ NOT IN BENZENE SERVICE DURING REPORTING PERIOD

(*) Attach required statement signed by responsible authority giving reason for not complying.

**SEMI-ANNUAL REPORT
VTAP FUGITIVE EMISSIONS CONTROL
LBC BATON ROUGE LLC**

UNIT I.D.: <u>Storage Tank 80-8</u>				
HAZARDOUS COMPONENT: <u>Benzene</u>				
REPORTING PERIOD: <u>January 01, 2015 - June 30, 2015</u>				
SHUTDOWN DATES DURING REPORTING PERIOD: <u>As Indicated</u>				
RESULTS:	1st Qtr. 2015	2nd Qtr. 2015		
<u>VALVES:</u>				
Number of valves in unit	@	@		
Number of valve leaks detected	@	@		
% Valves leaking	@	@		
Number of valve leaks detected and NOT repaired*	@	@		
<u>PUMPS:</u>				
Number of pumps in unit	@	@		
Number of pump leaks detected	@	@		
Number of pump leaks detected and NOT repaired (*)	@	@		
<u>COMPRESSORS:</u>				
Number of compressors in unit	@	@		
Number of compressor leaks detected	@	@		
Number of compressor leaks detected and NOT repaired (*)	@	@		
<u>PRESSURE SAFETY VALVES:</u>				
Number of PSV's in Unit	@	@		
Number of PSV leaks detected	@	@		
Number of PSV leaks detected and NOT repaired (*)	@	@		

@ NOT IN BENZENE SERVICE DURING REPORTING PERIOD

(*) Attach required statement signed by responsible authority giving reason for not complying.

**SEMI-ANNUAL REPORT
VTAP FUGITIVE EMISSIONS CONTROL
LBC BATON ROUGE LLC**

UNIT I.D.: <u>Marine Emissions Control System</u>				
HAZARDOUS COMPONENT: <u>Benzene</u>				
REPORTING PERIOD: <u>January 01, 2015 - June 30, 2015</u>				
SHUTDOWN DATES DURING REPORTING PERIOD: <u>As Indicated</u>				
RESULTS:	1st Qtr. 2015	2nd Qtr. 2015		
<u>VALVES:</u>				
Number of valves in unit	66	66		
Number of valve leaks detected	X	X		
% Valves leaking	X	X		
Number of valve leaks detected and NOT repaired*	X	X		
<u>PUMPS:</u>				
Number of pumps in unit	0	0		
Number of pump leaks detected	X	X		
Number of pump leaks detected and NOT repaired (*)	X	X		
<u>COMPRESSORS:</u>				
Number of compressors in unit	0	0		
Number of compressor leaks detected	0	0		
Number of compressor leaks detected and NOT repaired (*)	0	0		
<u>PRESSURE SAFETY VALVES:</u>				
Number of PSV's in Unit	4	4		
Number of PSV leaks detected	X	X		
Number of PSV leaks detected and NOT repaired (*)	X	X		

@ NOT IN BENZENE SERVICE DURING REPORTING PERIOD

(*) Attach required statement signed by responsible authority giving reason for not complying.(X) Components checked on an annual basis.

**SEMI-ANNUAL REPORT
VTAP FUGITIVE EMISSIONS CONTROL
LBC BATON ROUGE LLC**

UNIT I.D.: <u>Storage Tank 80-9</u>				
HAZARDOUS COMPONENT: <u>Benzene</u>				
REPORTING PERIOD: <u>January 01, 2015 - June 30, 2015</u>				
SHUTDOWN DATES DURING REPORTING PERIOD: <u>As Indicated</u>				
RESULTS:	1st Qtr. 2015	2nd Qtr. 2015		
<u>VALVES:</u>				
Number of valves in unit	14	14		
Number of valve leaks detected	0	0		
% Valves leaking	0	0		
Number of valve leaks detected and NOT repaired*	0	0		
<u>PUMPS:</u>				
Number of pumps in unit	0	0		
Number of pump leaks detected	0	0		
Number of pump leaks detected and NOT repaired (*)	0	0		
<u>COMPRESSORS:</u>				
Number of compressors in unit	0	0		
Number of compressor leaks detected	0	0		
Number of compressor leaks detected and NOT repaired (*)	0	0		
<u>PRESSURE SAFETY VALVES:</u>				
Number of PSV's in Unit	0	0		
Number of PSV leaks detected	0	0		
Number of PSV leaks detected and NOT repaired (*)	0	0		

@ NOT IN BENZENE SERVICE DURING REPORTING PERIOD

(*) Attach required statement signed by responsible authority giving reason for not complying.

**SEMI-ANNUAL REPORT
VTAP FUGITIVE EMISSIONS CONTROL
LBC BATON ROUGE LLC**

UNIT I.D.: <u>Storage Tank 80-1</u>				
HAZARDOUS COMPONENT: <u>Benzene</u>				
REPORTING PERIOD: <u>January 01, 2015 - June 30, 2015</u>				
SHUTDOWN DATES DURING REPORTING PERIOD: <u>As Indicated</u>				
RESULTS:	1st Qtr. 2015	2nd Qtr. 2015		
<u>VALVES:</u>				
Number of valves in unit	21	22		
Number of valve leaks detected	0	0		
% Valves leaking	0	0		
Number of valve leaks detected and NOT repaired*	0	0		
<u>PUMPS:</u>				
Number of pumps in unit	1	1		
Number of pump leaks detected	0	0		
Number of pump leaks detected and NOT repaired (*)	0	0		
<u>COMPRESSORS:</u>				
Number of compressors in unit	0	0		
Number of compressor leaks detected	0	0		
Number of compressor leaks detected and NOT repaired (*)	0	0		
<u>PRESSURE SAFETY VALVES:</u>				
Number of PSV's in Unit	0	0		
Number of PSV leaks detected	0	0		
Number of PSV leaks detected and NOT repaired (*)	0	0		

@ NOT IN BENZENE SERVICE DURING REPORTING PERIOD

(*) Attach required statement signed by responsible authority giving reason for not complying.

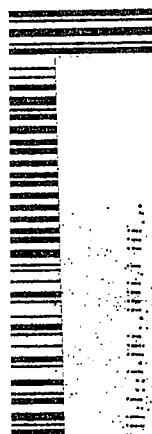
**SEMI-ANNUAL REPORT
VTAP FUGITIVE EMISSIONS CONTROL
LBC BATON ROUGE LLC**

UNIT I.D.: <u>Storage Tank 80-2</u>				
HAZARDOUS COMPONENT: <u>Benzene</u>				
REPORTING PERIOD: <u>January 01, 2015 - June 30, 2015</u>				
SHUTDOWN DATES DURING REPORTING PERIOD: <u>As Indicated</u>				
RESULTS:	1st Qtr. 2015	2nd Qtr. 2015		
<u>VALVES:</u>				
Number of valves in unit	19	19		
Number of valve leaks detected	0	0		
% Valves leaking	0	0		
Number of valve leaks detected and NOT repaired*	0	0		
<u>PUMPS:</u>				
Number of pumps in unit	1	1		
Number of pump leaks detected	0	0		
Number of pump leaks detected and NOT repaired (*)	0	0		
<u>COMPRESSORS:</u>				
Number of compressors in unit	0	0		
Number of compressor leaks detected	0	0		
Number of compressor leaks detected and NOT repaired (*)	0	0		
<u>PRESSURE SAFETY VALVES:</u>				
Number of PSV's in Unit	0	0		
Number of PSV leaks detected	0	0		
Number of PSV leaks detected and NOT repaired (*)	0	0		

@ **NOT IN BENZENE SERVICE DURING REPORTING PERIOD**

(*) Attach required statement signed by responsible authority giving reason for not complying.

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LBC
BANK TERMINALS

LBC Houston-Baton Rouge
11666 Port Road, Seabrook, Texas 77586-USA

LDEQ
Office of Environmental Assessment
P.O. Box 4314
Baton Rouge, LA 70821-4314



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Appendix 19
NESHAP Subpart EEEE
Semi-annual Compliance Reports for 2018



July 05, 2018

Office of Environmental Services
LDEQ - Capital Region Office
P.O. Box 4312
Baton Rouge, LA 70821-4312
Certified Mail# 7016 3010 0000 2910 6873

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AUG 01 2018

**LDEQ/OEC
ENFORCEMENT DIVISION**

RE: LBC Baton Rouge, LLC
OLD MACT Compliance report
Agency Interest No.: 3492

Please find enclosed the referenced report for the reporting period of January 01, 2018 to June 30, 2018 for LBC Baton Rouge, LLC

Please contact me at 281-291-3418 or d-bush@lbctt.com if any additional information is needed.

Sincerely,

A handwritten signature in black ink that reads "Danielle L. Bush". The signature is fluid and cursive, with the first name being the most prominent.

Danielle L. Bush
Regional Manager, Environmental Compliance

CC: LDEQ
Office of Environmental Services
P.O. Box 4313
Baton Rouge, LA 70821-4313
Certified Mail# 7016 3010 0000 2910 6880

LBC Houston-Baton Rouge

Bayport Terminal
Bayport Industrial Complex
11666 Port Road
Seabrook, Texas 77586-USA

Corporate Office USA
Phone: (281) 474-4433
Fax: (281) 291-3428

www.lbctt.com

**National Emission Standards for Hazardous Air Pollutants:
Organic Liquid Distribution (Non-Gasoline)
(40 CFR 63 EEEE)**

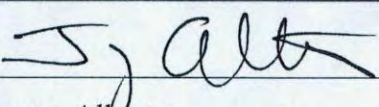
Compliance Report
40 CFR 63.2386(d) and (e)

§63.2386(d) Subsequent Compliance reports must contain the information in paragraphs (c)(1) through (c)(10) of this section and, where applicable, the information in paragraphs (d)(1) through (4) of this section.

§63.2386(c)(1) Company name and address

Company and Facility Information					
Permit Number	1280-00025-V8	County or Parish	Iberville	Date Permit Issued	01/23/2018
Company Name	LBC Baton Rouge, LLC				
Facility Name and Address	LBC Baton Rouge, Sunshine Terminal 1725 Hwy 75 Sunshine, LA 70780			Agency Interest Number (if applicable)	3492
Mailing Address	11666 Port Road				
City	Seabrook	State	TX	Zip Code	77586
Contact Name	Danielle L. Bush				
Phone Number	281-291-3418		Fax Number	281-749-8239	
E-mail Address	d-bush@lbctt.com				
Principal Facility Product/Business	Bulk Liquid Terminal				
New or Existing Facility	Existing Facility				

§63.2386(c)(2) Statement by a responsible official, including official's name, title, and signature, certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate and complete.

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)			
Responsible Official (typed)	Jeremy Alberty	Date	07/05/2018
Responsible Official Title	Director of Operations		

§63.2386(c)(3) Date of report and beginning and ending dates of the reporting period.

Submittal Date: 07/05/2018
(mm/dd/yyyy)

Applicable Reporting Period: 01/01/2018 to 06/30/2018
(mm/dd/yyyy) (mm/dd/yyyy)

§63.2386(c)(4) Any changes to the information listed in §63.2382(d)(2) that have occurred since the Notification of Compliance Status.

No information has changed in the Notification of Compliance Status.

§63.2386(c)(5) If you had a SSM during the reporting period and you took actions consistent with your SSM plan, the compliance report must include the information in §63.10(d)(5)(i).

There were no SSM events during the reporting period that exceeded emission limitations.

Type of Event	Number	Duration	Brief Description

§63.2386(c)(6) If there are no deviations from any emission limitation or operating limit that applies to you and there are no deviations from the requirements for work practice standards, a statement that there were no deviations from the emission limitations, operating limits, or work practice standards during the reporting period.

There were no deviations from any emission limitations, operating limits, or work practice standards that apply to the facility occurred during the reporting period.

§63.2386(c)(7) If there were no periods during which the CMS was out of control as specified in §63.8(c)(7), a statement that there were no periods during which the CMS was out of control during the reporting period.

This section does not apply as there are no CMS required.

§63.2386(c)(8) For closed vent system and control devices used for to control emissions, the information specified in paragraphs (c)(8)(i) and (ii) of this section for those planned routine maintenance activities that would require the control device to not meet the applicable emission limit.

§63.2386(c)(8)(i) A description of the planned routine maintenance that is anticipated to be performed for the control device during the next 6 months. This description must include the type of maintenance necessary, planned frequency of maintenance, and lengths of maintenance periods.

There is no planned routine maintenance anticipated during the next 6 months.

Equipment Number	Equipment Description	Type of Maintenance	Planned Frequency of Maintenance	Length of Each Maintenance Period

§63.2386(c)(8)(ii) A description of the planned routine maintenance that was performed for the control device during the previous 6 months. This description must include the type of maintenance performed and the total number of hours that the control device did not meet the applicable emission limit due to planned routine maintenance.

No planned routine maintenance was performed during the previous 6 months that the control device did not meet the applicable emission limit due to the planned routine maintenance.

Equipment Number	Equipment Description	Type of Maintenance	Hours

§63.2386(c)(9) A listing of all emission sources that are a part of the affected source but not subject to any emission limitation, operating limits or work practice standards of this subpart.

Truck and rail loading racks are a part of the affected source. However, are not subject to any emission limitation, operating limits or work practice standards.

§63.2386(c)(10) A listing of all transport vehicles into which organic liquids were loaded at affected transfer racks during the previous 6 months for which vapor tightness documentation as required in §63.2390(d) was not on file at the facility.

Vapor tightness documentation for all transport vehicles into which organic liquids were loaded are on file at the facility.

§63.2386(d)(1) For each deviation from an emission limitation occurring at an affected source where you are using a CMS to comply with an emission limitation in this subpart, you must include in the Compliance Report the applicable information in paragraphs (d)(1)(i) through (xii) of this section. This includes periods of SSM.

This section does not apply as there are no CMS required.

§63.2386(d)(2) Include in the Compliance report the information in paragraphs (d)(2)(i) through (iii) of this section, as applicable.

§63.2386(d)(2)(i) For each storage tank and transfer rack subject to control requirements, include periods of planned routine maintenance during which the control device did not comply with the applicable emissions limit in Table 2 to this subpart.

See §63.2386(c)(8)(ii) on previous pages of this report.

§63.2386(d)(2)(ii) For each storage tank controlled with a floating roof, include a copy of the inspection record (required in §63.1065(b)) when inspection failure occurs.

No inspection failures occurred during the compliance period.

§63.2386(d)(2)(iii) If you elect to use an extension for a floating roof inspection in accordance with §63.1063(c)(2)(iv)(B) or (e)(2), include the documentation required by those paragraphs.

No extensions for floating roof inspections were used during the compliance period.

§63.2386(d)(3)(i) A listing of any storage tank that became subject to controls based on the criteria for control specified in Table 2 to this subpart, items 1 through 6, since the filing of the last Compliance report.

No storage tanks became subject to controls since the filing of the last Compliance Report.

§63.2386(d)(3)(ii) A listing of any transfer rack that became subject to controls based on the criteria for control specified in Table 2 to this subpart, items 7 through 10, since the filing of the last Compliance report.

There were no transfer racks that became subject to controls since the filing of the last Compliance Report.

§63.2386(d)(4)(i) A listing of tanks greater than or equal to 18.9 cubic meters (5,000 gallons) that became part of the affected source but are not subject to any of the emission limitations, operating limits, or work practice standards of this subpart, since the last compliance report.

There are no tanks that are greater than or equal to 18.9 cubic meters (5,000 gallons) and that are not subject to emission limitations, operating limits, or work practices became part of the affected source.

§63.2386(d)(4)(ii) A listing of all transfer racks (except those racks at which only the unloading of organic liquids occurs) that became part of the affected source but are not subject to any emission limitations , operating limits, or work practice standards under this subpart, since the last compliance report.

There were no transfer racks that are not subject to emission limitations, operating limits, or work practices became part of the affected source.

§63.2386 (e) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to table 11 to this subpart along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission limitation in this subpart, we will consider submission of the Compliance report as satisfying any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report will not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the applicable title V permitting authority.

All deviations as defined in this subpart will be reported in the Title V semiannual report.



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LDEQ
Office of Environmental Services
P.O. Box 4313
Baton Rouge, LA 70821-4313



January 15, 2019

Office of Environmental Services
LDEQ – Capital Region Office
P.O. Box 4312
Baton Rouge, LA 70821-4312
Certified Mail# 7017 1000 0000 5921 4249

RE: LBC Baton Rouge. LLC
OLD MACT Compliance report
Agency Interest No.: 3492

Please find enclosed the referenced report for the reporting period of July 01, 2018 to December 31, 2018 for LBC Baton Rouge, LLC

Please contact me at 281-291-3418 or d-bush@lbctt.com if any additional information is needed.

Sincerely,

A handwritten signature in blue ink that reads "Danielle L. Bush". The signature is fluid and cursive, with the first name being the most prominent.

Danielle L. Bush
Regional Manager, Environmental Compliance

CC: LDEQ
Office of Environmental Services
P.O. Box 4313
Baton Rouge, LA 70821-4313
Certified Mail# 7017 1000 0000 5921 4263

LBC Houston-Baton Rouge

Bayport Terminal
Bayport Industrial Complex
11666 Port Road
Seabrook, Texas 77586-USA

Corporate Office USA
Phone: (281) 474-4433
Fax: (281) 291-3428

www.lbctt.com

**National Emission Standards for Hazardous Air Pollutants:
Organic Liquid Distribution (Non-Gasoline)
(40 CFR 63 EEEE)**

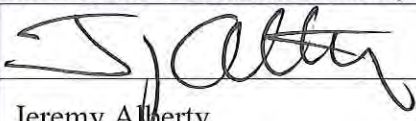
Compliance Report
40 CFR 63.2386(d) and (e)

§63.2386(d) Subsequent Compliance reports must contain the information in paragraphs (c)(1) through (c)(10) of this section and, where applicable, the information in paragraphs (d)(1) through (4) of this section.

§63.2386(c)(1) Company name and address

Company and Facility Information					
Permit Number	1280-00025-V9	County or Parish	Iberville	Date Permit Issued	10/17/18
Company Name	LBC Baton Rouge, LLC				
Facility Name and Address	LBC Baton Rouge, Sunshine Terminal 1725 Hwy 75 Sunshine, LA 70780			Agency Interest Number (if applicable)	3492
Mailing Address	11666 Port Road				
City	Seabrook	State	TX	Zip Code	77586
Contact Name	Danielle L. Bush				
Phone Number	281-291-3418		Fax Number	281-749-8239	
E-mail Address	d-bush@lbett.com				
Principal Facility Product/Business	Bulk Liquid Terminal				
New or Existing Facility	Existing Facility				

§63.2386(c)(2) Statement by a responsible official, including officials name, title, and signature, certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate and complete.

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)			
Responsible Official (typed)	Jeremy Alberty	Date	01/15/2019
Responsible Official Title	Director of Operations		

§63.2386(c)(3) Date of report and beginning and ending dates of the reporting period.

Submittal Date: 01/15/2019
(mm/dd/yyyy)

Applicable Reporting Period: 07/01/2018 to 12/31/2018
(mm/dd/yyyy) (mm/dd/yyyy)

§63.2386(c)(4) Any changes to the information listed in §63.2382(d)(2) that have occurred since the Notification of Compliance Status.

No information has changed in the Notification of Compliance Status.

§63.2386(c)(5) If you had a SSM during the reporting period and you took actions consistent with your SSM plan, the compliance report must include the information in §63.10(d)(5)(i).

There were no SSM events during the reporting period that exceeded emission limitations.

Type of Event	Number	Duration	Brief Description

§63.2386(c)(6) If there are no deviations from any emission limitation or operating limit that applies to you and there are no deviations from the requirements for work practice standards, a statement that there were no deviations from the emission limitations, operating limits, or work practice standards during the reporting period.

There were no deviations from any emission limitations, operating limits, or work practice standards that apply to the facility occurred during the reporting period.

§63.2386(c)(7) If there were no periods during which the CMS was out of control as specified in §63.8(c)(7), a statement that there were no periods during which the CMS was out of control during the reporting period.

This section does not apply as there are no CMS required.

§63.2386(c)(8) For closed vent system and control devices used for to control emissions, the information specified in paragraphs (c)(8)(i) and (ii) of this section for those planned routine maintenance activities that would require the control device to not meet the applicable emission limit.

§63.2386(c)(8)(i) A description of the planned routine maintenance that is anticipated to be performed for the control device during the next 6 months. This description must include the type of maintenance necessary, planned frequency of maintenance, and lengths of maintenance periods.

There is no planned routine maintenance anticipated during the next 6 months.

Equipment Number	Equipment Description	Type of Maintenance	Planned Frequency of Maintenance	Length of Each Maintenance Period

§63.2386(c)(8)(ii) A description of the planned routine maintenance that was performed for the control device during the previous 6 months. This description must include the type of maintenance performed and the total number of hours that the control device did not meet the applicable emission limit due to planned routine maintenance.

No planned routine maintenance was performed during the previous 6 months that the control device did not meet the applicable emission limit due to the planned routine maintenance.

Equipment Number	Equipment Description	Type of Maintenance	Hours

§63.2386(c)(9) A listing of all emission sources that are a part of the affected source but not subject to any emission limitation, operating limits or work practice standards of this subpart.

Truck and rail loading racks are a part of the affected source. However, are not subject to any emission limitation, operating limits or work practice standards.

§63.2386(c)(10) A listing of all transport vehicles into which organic liquids were loaded at affected transfer racks during the previous 6 months for which vapor tightness documentation as required in §63.2390(d) was not on file at the facility.

Vapor tightness documentation for all transport vehicles into which organic liquids were loaded are on file at the facility.

§63.2386(d)(1) For each deviation from an emission limitation occurring at an affected source where you are using a CMS to comply with an emission limitation in this subpart, you must include in the Compliance Report the applicable information in paragraphs (d)(1)(i) through (xii) of this section. This includes periods of SSM.

This section does not apply as there are no CMS required.

§63.2386(d)(2) Include in the Compliance report the information in paragraphs (d)(2)(i) through (iii) of this section, as applicable.

§63.2386(d)(2)(i) For each storage tank and transfer rack subject to control requirements, include periods of planned routine maintenance during which the control device did not comply with the applicable emissions limit in Table 2 to this subpart.

See §63.2386(c)(8)(ii) on previous pages of this report.

§63.2386(d)(2)(ii) For each storage tank controlled with a floating roof, include a copy of the inspection record (required in §63.1065(b)) when inspection failure occurs.

No inspection failures occurred during the compliance period.

§63.2386(d)(2)(iii) If you elect to use an extension for a floating roof inspection in accordance with §63.1063(c)(2)(iv)(B) or (e)(2), include the documentation required by those paragraphs.

No extensions for floating roof inspections were used during the compliance period.

§63.2386(d)(3)(i) A listing of any storage tank that became subject to controls based on the criteria for control specified in Table 2 to this subpart, items 1 through 6, since the filing of the last Compliance report.

No storage tanks became subject to controls since the filing of the last Compliance Report.

§63.2386(d)(3)(ii) A listing of any transfer rack that became subject to controls based on the criteria for control specified in Table 2 to this subpart, items 7 through 10, since the filing of the last Compliance report.

There were no transfer racks that became subject to controls since the filing of the last Compliance Report.

§63.2386(d)(4)(i) A listing of tanks greater than or equal to 18.9 cubic meters (5,000 gallons) that became part of the affected source but are not subject to any of the emission limitations, operating limits, or work practice standards of this subpart, since the last compliance report.

There are no tanks that are greater than or equal to 18.9 cubic meters (5,000 gallons) and that are not subject to emission limitations, operating limits, or work practices became part of the affected source.

§63.2386(d)(4)(ii) A listing of all transfer racks (except those racks at which only the unloading of organic liquids occurs) that became part of the affected source but are not subject to any emission limitations , operating limits, or work practice standards under this subpart, since the last compliance report.

There were no transfer racks that are not subject to emission limitations, operating limits, or work practices became part of the affected source.

§63.2386 (e) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to table 11 to this subpart along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission limitation in this subpart, we will consider submission of the Compliance report as satisfying any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report will not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the applicable title V permitting authority.

All deviations as defined in this subpart will be reported in the Title V semiannual report.

Appendix 20
NSPS Notification of Initial Startup –
Tanks 80-1, 80-2, 55-15



September 24, 2013

LDEQ

Office of Environmental Services

Air Permits Division

P.O. Box 4313

Baton Rouge LA 70821-4313

RE: Notification of Initial Startup - Storage Tank 80-1
Title V General Permit No: 1280-00025-V5
Agency Interest No. 3492

Dear Sir or Madam:

In accordance with the requirements of 40 CFR 60.7 (a)(3), LBC Baton Rouge, LLC, located at 1725 Hwy. 75, Sunshine LA 70780, hereby provides notice that aboveground storage tank 80-1 was placed into product service (initial start-up) on September 24, 2013. The start-up did not result in unauthorized emissions, which equal or exceed the reportable quantity. Records are maintained on site.

If you have any questions or require additional information please contact me at (281) 291-3418 or dbush@lbchouston.com.

Regards,

A handwritten signature in black ink that reads "Danielle L. Bush". The signature is written in a cursive, flowing style.

Danielle L. Bush
Assistant Manager, Environmental Compliance

c: US Environmental Protection Agency
Region VI
Director, Air, Pesticides and Toxics
1445 Ross Avenue
Dallas, Texas 75202-2733

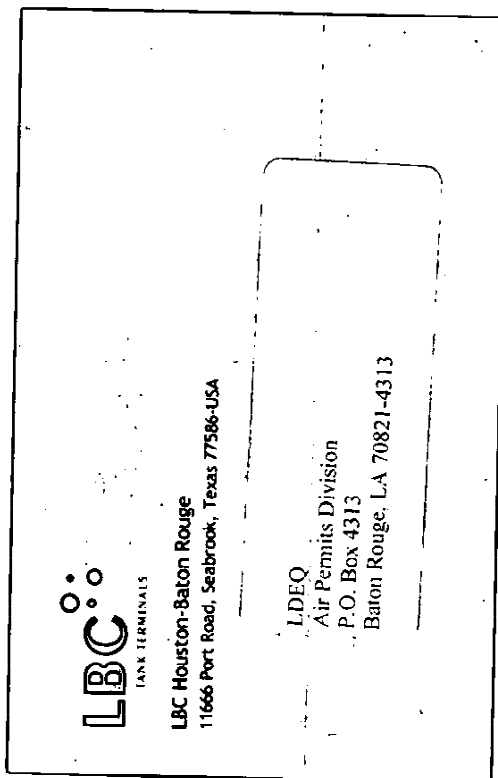
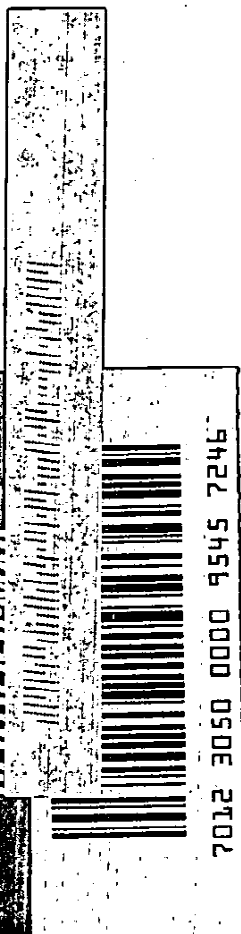
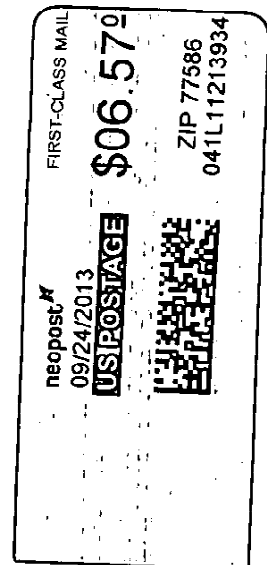
DEQ - OES
2013 OCT -2 PM 1:27

LBC Houston-Baton Rouge

Bayport Terminal
Bayport Industrial Complex
11666 Port Road
Seabrook, Texas 77586-USA

Corporate Office USA
tel: 281-474-4433
fax: 281-291-3428

www.lbccl.com





April 1, 2014

DEQ - OES

2014 APR -7 PM 1:47

LDEQ
Office of Environmental Services
Air Permits Division
P.O. Box 4313
Baton Rouge LA 70821-4313

RE: Notification of Initial Startup - Storage Tank 80-2
Title V General Permit No: 1280-00025-V5
Agency Interest No. 3492

Dear Sir or Madam:

In accordance with the requirements of 40 CFR 60.7 (a)(3), LBC Baton Rouge, LLC, located at 1725 Hwy. 75, Sunshine LA 70780, hereby provides notice that aboveground storage tank 80-1 was placed into product service (initial start-up) on March 22, 2014. The start-up did not result in unauthorized emissions, which equal or exceed the reportable quantity. Records are maintained on site.

If you have any questions or require additional information please contact me at (281) 291-3418 or dbush@lbchouston.com.

Regards,

A handwritten signature in cursive script that reads "Danielle L. Bush".

Danielle L. Bush
Assistant Manager, Environmental Compliance

c: US Environmental Protection Agency
Region VI
Director, Air, Pesticides and Toxics
1445 Ross Avenue
Dallas, Texas 75202-2733

LBC Houston-Baton Rouge

Bayport Terminal
Bayport Industrial Complex
11666 Port Road
Seabrook, Texas 77586-USA

Corporate Office USA
tel: 281-474-4433
fax: 281-291-3428

www.lbctt.com

MAIN FILE



December 14, 2016

LDEQ
Office of Environmental Services
Air Permits Division
P.O. Box 4313
Baton Rouge LA 70821-4313

original to JOA
copy to MFG & ECHO

RE: Notification of Initial Startup - Storage Tank 55-15
Title V General Permit No: 1280-00025-V7
Agency Interest No. 3492 ✓

Dear Sir or Madam:

In accordance with the requirements of 40 CFR 60.7 (a)(3), LBC Baton Rouge, LLC, located at 1725 Hwy. 75, Sunshine LA 70780, hereby provides notice that aboveground storage tank 80-1 was placed into product service (initial start-up) on December 02, 2016. The start-up did not result in unauthorized emissions, which equal or exceed the reportable quantity. Records are maintained on site.

If you have any questions or require additional information please contact me at (281) 291-3418 or d-bush@lbctt.com.

Regards,

A handwritten signature in cursive script, appearing to read "Danielle L. Bush".

Danielle L. Bush
Regional Manager, Environmental Compliance

2016 DEC 19 PM 2:03

LBC Houston-Baton Rouge

Bayport Terminal
Bayport Industrial Complex
11666 Port Road
Seabrook, Texas 77586-USA

Corporate Office USA
Phone: (281) 474-4433

www.lbctt.com

Appendix 21

Tanks 55-14 and 55-15

**MAIN FILE**

2016 NOV 18 PM 2:20

November 14, 2016

LDEQ
Office of Environmental Services
Air Permits Division
P.O. Box 4313
Baton Rouge LA 70821-4313

original to IOA
copy to MFG/6hoo

RE: Completion of Construction - Storage Tanks 55-14 & 55-15
Title V General Permit No: 1280-00025-V7
Agency Interest No. 3492 ✓

Dear Sir or Madam:

LBC Baton Rouge, LLC (LBC), located at 1725 Hwy. 75, Sunshine LA 70780, hereby submits notice that construction of aboveground storage tanks 55-14 and 55-15 was completed on November 09, 2016. The estimated date of start-up of operation is November 18, 2016. This report is being submitted in accordance with "General Condition VI" of the referenced permit.

If you have any questions or require additional information please contact me at (281) 291-3418 or d-bush@lbctt.com.

Regards,

A handwritten signature in black ink, appearing to read "Danielle L. Bush".

Danielle L. Bush
Regional Manager, Environmental Compliance

c: Capital Region Office
P.O. Box 4312
Baton Rouge, LA 70821-4312

LBC Houston-Baton Rouge

Bayport Terminal
Bayport Industrial Complex
11666 Port Road
Seabrook, Texas 77586-USA

Corporate Office USA
Phone: (281) 474-4433
Fax: (281) 291-3428

www.lbctt.com



2016 NOV 10 PM 3:20

MAIN FILE

November 3, 2016

LDEQ
Office of Environmental Services
P.O. Box 4313
Baton Rouge LA 70821-4313

RE: LBC Baton Rouge LLC
1725 Hwy. 75, Sunshine LA 70780
Permit No: 1280-00025-V7
Agency Interest No. 3492
IFR Inspection Notification – Tanks 55-14 & 55-15

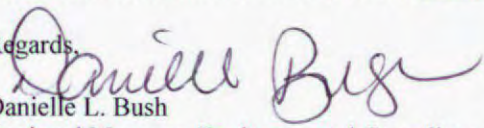
LBC Baton Rouge, LLC (LBC), located at 1725 HWY.75, Sunshine, hereby provides 7-day advance written notification of the intent to conduct internal inspection of the internal floating roof (IFR) associated with the referenced aboveground storage tanks. Due to the uncertainty of the future product to be stored, this notification is intended to meet the requirements of all applicable notification regulations and permit requirements, including, but not limited to the following: 40 CFR 63.1066, 40 CFR 60.113b(a)(5), and 40 CFR 61.272(a)(3)(i). LBC anticipates conducting the inspection on or after November 9, 2016

The referenced tank is equipped with an internal floating roof and associated seals that meet the requirements of the applicable regulations.

LBC was unable to provide a 30-day written advance notification, as we were not made aware of our customer's intentions in sufficient time. Due to the dynamic nature of the bulk liquid storage industry, it is common for customers to provide short notice of their desire to initiate or terminate product storage at the facility.

Please contact me at 281-291-3418 or at d-bush@lbctt.com if any additional information is needed.

Regards,


Danielle L. Bush
Regional Manager, Environmental Compliance

CC: LDEQ
P.O. Box 4312
Baton Rouge LA 70821-4312

LBC Houston-Baton Rouge

Bayport Terminal
Bayport Industrial Complex
11666 Port Road
Seabrook, Texas 77586-USA

Corporate Office USA
Phone: (281) 474-4433
Fax: (281) 291-3428

www.lbctt.com



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 55-14

Date: 11-8-16

IFR Resting on Liquid? (floating)	Yes	☒ No
Liquid on IFR?	Yes	☒ No
Tears in IFR?	Yes	☒ No
Visible Gaps Between IFR and Outer Wall?	Yes	☒ No
Seal detached From IFR?	Yes	☒ No

Inspection By: Todd Browne
(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)

MAIN FILE



December 14, 2016

LDEQ
Office of Environmental Services
Air Permits Division
P.O. Box 4313
Baton Rouge LA 70821-4313

original to JOA
copy to MFG & ECHO

RE: Notification of Initial Startup - Storage Tank 55-15
Title V General Permit No: 1280-00025-V7
Agency Interest No. 3492 ✓

Dear Sir or Madam:

In accordance with the requirements of 40 CFR 60.7 (a)(3), LBC Baton Rouge, LLC, located at 1725 Hwy. 75, Sunshine LA 70780, hereby provides notice that aboveground storage tank 80-1 was placed into product service (initial start-up) on December 02, 2016. The start-up did not result in unauthorized emissions, which equal or exceed the reportable quantity. Records are maintained on site.

If you have any questions or require additional information please contact me at (281) 291-3418 or d-bush@lbctt.com.

Regards,

A handwritten signature in cursive script, appearing to read "Danielle L. Bush".

Danielle L. Bush
Regional Manager, Environmental Compliance

2016 DEC 19 PM 2:03

LBC Houston-Baton Rouge

Bayport Terminal
Bayport Industrial Complex
11666 Port Road
Seabrook, Texas 77586-USA

Corporate Office USA
Phone: (281) 474-4433

www.lbctt.com

Appendix 22
7-day Inspection Notification for
Tanks 15-2, 120-1, 120-2 in 2017



January 4, 2017

LDEQ
Office of Environmental Services
P.O. Box 4313
Baton Rouge LA 70821-4313

RE: LBC Baton Rouge LLC
1725 Hwy. 75, Sunshine LA 70780
Permit No: 1280-00025-V7
Agency Interest No. 3492
IFR Inspection Notification – Tank 15-2

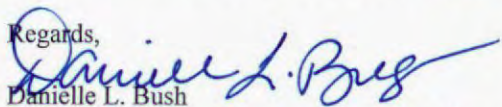
RECEIVED
JAN 11 2017
LDEQ/OEC
ENFORCEMENT DIVISION

LBC Baton Rouge, LLC (LBC), located at 1725 HWY.75, Sunshine, hereby provides 7-day advance written notification of the intent to conduct internal inspection of the internal floating roof (IFR) associated with the referenced aboveground storage tank. Due to the uncertainty of the future product to be stored, this notification is intended to meet the requirements of all applicable notification regulations and permit requirements, including, but not limited to the following: 40 CFR 63.1066, 40 CFR 60.113b(a)(5), and 40 CFR 61.272(a)(3)(i). LBC anticipates conducting the inspection on or after January 10, 2017.

The referenced tank is equipped with an internal floating roof and associated seals that meet the requirements of the applicable regulations.

LBC was unable to provide a 30-day written advance notification, as we were not made aware of our customer's intentions in sufficient time. Due to the dynamic nature of the bulk liquid storage industry, it is common for customers to provide short notice of their desire to initiate or terminate product storage at the facility.

Please contact me at 281-291-3418 or at d-bush@lbctt.com if any additional information is needed.

Regards,

Danielle L. Bush
Regional Manager, Environmental Compliance

CC: LDEQ
P.O. Box 4312
Baton Rouge LA 70821-4312

LBC Houston-Baton Rouge

Bayport Terminal
Bayport Industrial Complex
11666 Port Road
Seabrook, Texas 77586-USA

Corporate Office USA
Phone: (281) 474-4433
Fax: (281) 291-3428

www.lbctt.com

CERTIFIED MAIL

Full Inspection Report Page 238 of 254



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01/04/2017

US POSTAGE

FIRST-CLASS

\$07.1



ZIP 775
041L1124



LBC Houston-Baton Rouge
11666 Port Road, Seabrook, Texas 77586-USA

LDEQ
P.O. Box 4312
Baton Rouge, LA 70821-4312

Nov. 10. 2017 11:57AM

No. 4056 P. 1



Office of Environmental Compliance
Inspections Division

NOV 13 2017

Received

November 10, 2017

LDEQ
Office of Environmental Services
P.O. Box 4313
Baton Rouge LA 70821-4313

RE: LBC Baton Rouge LLC
1725 Hwy. 75, Sunshine LA 70780
Permit No: 1280-00025-V7
Agency Interest No. 3492
IFR Inspection Notification – Tank 120-1

LBC Baton Rouge, LLC (LBC), located at 1725 HWY.75, Sunshine, hereby provides 7-day advance written notification of the intent to conduct internal inspection of the internal floating roof (IFR) associated with the referenced aboveground storage tank. Due to the uncertainty of the future product to be stored, this notification is intended to meet the requirements of all applicable notification regulations and permit requirements, including, but not limited to the following: 40 CFR 63.1066, 40 CFR 60.113b(a)(5), and 40 CFR 61.272(a)(3)(i). LBC anticipates conducting the inspection on or after November 16, 2017.

The referenced tank is equipped with an internal floating roof and associated seals that meet the requirements of the applicable regulations.

LBC was unable to provide a 30-day written advance notification, as we were not made aware of our customer's intentions in sufficient time. Due to the dynamic nature of the bulk liquid storage industry, it is common for customers to provide short notice of their desire to initiate or terminate product storage at the facility.

Please contact me at 281-291-3418 or at d-bush@lbctt.com if any additional information is needed.

Regards,

A handwritten signature in black ink, appearing to read "Danielle L. Bush".

Danielle L. Bush

Regional Manager, Environmental Compliance

CC: LDEQ
P.O. Box 4312
Baton Rouge LA 70821-4312

LBC Houston-Baton Rouge

Bayport Terminal
Bayport Industrial Complex
11666 Port Road
Seabrook, Texas 77586-USA

Corporate Office USA
Phone: (281) 474-4333
Fax: (281) 291-3418

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DEQ - OES
2017 APR 24 PM 1:00

MAIN FILE

April 18, 2017

LDEQ
Office of Environmental Services
P.O. Box 4313
Baton Rouge LA 70821-4313

RE: LBC Baton Rouge LLC
1725 Hwy. 75, Sunshine LA 70780
Permit No: 1280-00025-V7
Agency Interest No. 3492
IFR Inspection Notification – Tank 120-2

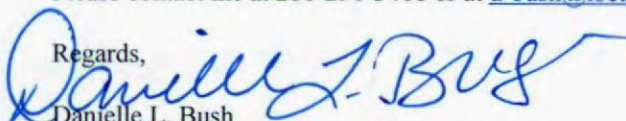
LBC Baton Rouge, LLC (LBC), located at 1725 HWY.75, Sunshine, hereby provides 7-day advance written notification of the intent to conduct internal inspection of the internal floating roof (IFR) associated with the referenced aboveground storage tank. Due to the uncertainty of the future product to be stored, this notification is intended to meet the requirements of all applicable notification regulations and permit requirements, including, but not limited to the following: 40 CFR 63.1066, 40 CFR 60.113b(a)(5), and 40 CFR 61.272(a)(3)(i). LBC anticipates conducting the inspection on or after April 24, 2017.

The referenced tank is equipped with an internal floating roof and associated seals that meet the requirements of the applicable regulations.

LBC was unable to provide a 30-day written advance notification, as we were not made aware of our customer's intentions in sufficient time. Due to the dynamic nature of the bulk liquid storage industry, it is common for customers to provide short notice of their desire to initiate or terminate product storage at the facility.

Please contact me at 281-291-3418 or at d-bush@lbctt.com if any additional information is needed.

Regards,


Danielle L. Bush
Regional Manager, Environmental Compliance

CC: LDEQ
P.O. Box 4312
Baton Rouge LA 70821-4312

LBC Houston-Baton Rouge

Bayport Terminal
Bayport Industrial Complex
11666 Port Road
Seabrook, Texas 77586-USA

Corporate Office USA
Phone: (281) 474-4433
Fax: (281) 291-3428

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Appendix 23

External Inspection Forms 2016



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 15-2Date: 11/30/14IFR Resting on Liquid?
(floating)☒ Yes☐ No

Liquid on IFR?

☐ Yes☒ No

Tears in IFR?

☐ Yes☒ NoVisible Gaps Between IFR
and Outer Wall?☐ Yes☒ No

Seal detached From IFR?

☐ Yes☒ NoInspection By: 

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 20-1Date: 11/29/14IFR Resting on Liquid?
(floating)

Yes

No

Liquid on IFR?

Yes

No

Tears in IFR?

Yes

NoVisible Gaps Between IFR
and Outer Wall?

Yes

No

Seal detached From IFR?

Yes

NoInspection By: Chad R.

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)

Empty



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 55-4Date: 11/28/16IFR Resting on Liquid?
(floating)Yes

No

Liquid on IFR?

Yes

No

Tears in IFR?

Yes

NoVisible Gaps Between IFR
and Outer Wall?

Yes

No

Seal detached From IFR?

Yes

NoInspection By: Chad R.

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 55-5Date: 11-29-16IFR Resting on Liquid?
(floating)☒ Yes☐ No

Liquid on IFR?

☐ Yes☒ No

Tears in IFR?

☐ Yes☒ NoVisible Gaps Between IFR
and Outer Wall?☐ Yes☒ No

Seal detached From IFR?

☐ Yes☒ NoInspection By: 

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 55-6Date: 11-30-14IFR Resting on Liquid?
(floating)☒ Yes☐ No

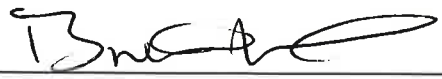
Liquid on IFR?

☐ Yes☒ No

Tears in IFR?

☐ Yes☒ NoVisible Gaps Between IFR
and Outer Wall?☐ Yes☒ No

Seal detached From IFR?

☐ Yes☒ NoInspection By: 

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 55-7Date: 11/29/16IFR Resting on Liquid?
(floating)Yes

No

Liquid on IFR?

Yes

No

Tears in IFR?

Yes

NoVisible Gaps Between IFR
and Outer Wall?

Yes

No

Seal detached From IFR?

Yes

NoInspection By: Chad R.
(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 55-8Date: 11-30-14IFR Resting on Liquid?
(floating)☒ Yes☐ No

Liquid on IFR?

☐ Yes☒ No

Tears in IFR?

☐ Yes☒ NoVisible Gaps Between IFR
and Outer Wall?☐ Yes☒ No

Seal detached From IFR?

☐ Yes☒ NoInspection By: Brian Ambrose

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 55-9Date: 11-28-16IFR Resting on Liquid?
(floating)☒ Yes

No

Liquid on IFR?

Yes

☒ No

Tears in IFR?

Yes

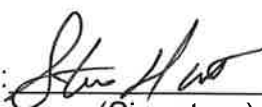
☒ NoVisible Gaps Between IFR
and Outer Wall?

Yes

☒ No

Seal detached From IFR?

Yes

☒ NoInspection By: 

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 55-10Date: 11-28-16IFR Resting on Liquid?
(floating)☒ Yes

No

Liquid on IFR?

Yes

☒ No

Tears in IFR?

Yes

☒ NoVisible Gaps Between IFR
and Outer Wall?

Yes

☒ No

Seal detached From IFR?

Yes

☒ NoInspection By: John Lambert
(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 55-11Date: 11-28-16IFR Resting on Liquid?
(floating)☒ Yes

No

Liquid on IFR?

Yes

☒ No

Tears in IFR?

Yes

☒ NoVisible Gaps Between IFR
and Outer Wall?

Yes

☒ No

Seal detached From IFR?

Yes

☒ No

Inspection By: John Lambert
(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 55-13Date: 11/29/16IFR Resting on Liquid?
(floating)☒ Yes☐ No

Liquid on IFR?

☐ Yes☒ No

Tears in IFR?

☐ Yes☒ NoVisible Gaps Between IFR
and Outer Wall?☐ Yes☒ No

Seal detached From IFR?

☐ Yes☒ NoInspection By: Chad King
(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)Tank # 55-14Date: 11/29/16IFR Resting on Liquid?
(floating)

Yes

No

Liquid on IFR?

Yes

No

Tears in IFR?

Yes

NoVisible Gaps Between IFR
and Outer Wall?

Yes

No

Seal detached From IFR?

Yes

NoInspection By: Chalky

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)

Empty



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)Tank # 55-15Date: 11/29/16IFR Resting on Liquid?
(floating)

Yes

☒ No

Liquid on IFR?

Yes

☒ No

Tears in IFR?

Yes

☒ NoVisible Gaps Between IFR
and Outer Wall?

Yes

☒ No

Seal detached From IFR?

Yes

☒ NoInspection By: Chad Li

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)

Empty



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 80-1Date: 11-28-16IFR Resting on Liquid?
(floating)☒ Yes☐ No

Liquid on IFR?

☐ Yes☒ No

Tears in IFR?

☐ Yes☒ NoVisible Gaps Between IFR
and Outer Wall?☐ Yes☒ No

Seal detached From IFR?

☐ Yes☒ No

Inspection By: _____

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 80-2

Date: 11-30-16

IFR Resting on Liquid?
(floating)

Yes

~~No~~

Liquid on IFR?

Yes

No

Tears in IFR?

Yes

No

Visible Gaps Between IFR
and Outer Wall?

Yes

No

Seal detached From IFR?

Yes

No

Inspection By: 

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 80-6Date: 11/30/14IFR Resting on Liquid?
(floating)☒ Yes☐ No

Liquid on IFR?

☐ Yes☒ No

Tears in IFR?

☐ Yes☒ NoVisible Gaps Between IFR
and Outer Wall?☐ Yes☒ No

Seal detached From IFR?

☐ Yes☒ No

Inspection By: _____

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)Tank # 80-7Date: 11-30-11IFR Resting on Liquid?
(floating)☒ Yes

No

Liquid on IFR?

Yes

☒ No

Tears in IFR?

Yes

☒ NoVisible Gaps Between IFR
and Outer Wall?

Yes

☒ No

Seal detached From IFR?

Yes

☒ NoInspection By: S. Falca

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 80-8Date: 12-1-16IFR Resting on Liquid?
(floating)☒ Yes☐ No

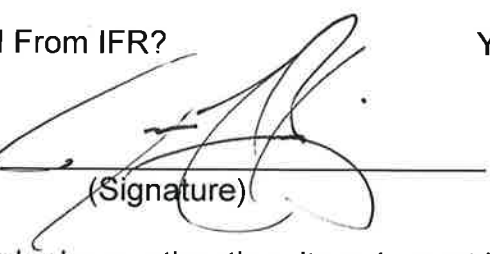
Liquid on IFR?

☐ Yes☒ No

Tears in IFR?

☐ Yes☒ NoVisible Gaps Between IFR
and Outer Wall?☐ Yes☒ No

Seal detached From IFR?

☐ Yes☒ NoInspection By: 

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 80-9Date: 11/29/16IFR Resting on Liquid?
(floating)Yes

No

Liquid on IFR?

Yes

No

Tears in IFR?

Yes

NoVisible Gaps Between IFR
and Outer Wall?

Yes

No

Seal detached From IFR?

Yes

NoInspection By: Charles

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 110-1Date: 11-28-16IFR Resting on Liquid?
(floating)☒ Yes☐ No

Liquid on IFR?

☐ Yes☒ No

Tears in IFR?

☐ Yes☒ NoVisible Gaps Between IFR
and Outer Wall?☐ Yes☒ No

Seal detached From IFR?

☐ Yes☒ NoInspection By: S. Falcon

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

~~External Inspection~~ / ~~Internal Inspection~~
(Circle one)

Tank # 110-2Date: 11-28-16IFR Resting on Liquid?
(floating)☒ Yes

No

Liquid on IFR?

Yes

☒ No

Tears in IFR?

Yes

☒ NoVisible Gaps Between IFR
and Outer Wall?

Yes

☒ No

Seal detached From IFR?

Yes

☒ NoInspection By: S. Falcon

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 110-3Date: 11-29-16IFR Resting on Liquid?
(floating)☒ Yes☐ No

Liquid on IFR?

☐ Yes☒ No

Tears in IFR?

☐ Yes☒ NoVisible Gaps Between IFR
and Outer Wall?☐ Yes☒ No

Seal detached From IFR?

☐ Yes☒ NoInspection By: S F9/16

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 110-4Date: 11-23-16IFR Resting on Liquid?
(floating)☒ Yes

No

Liquid on IFR?

Yes

☒ No

Tears in IFR?

Yes

☒ NoVisible Gaps Between IFR
and Outer Wall?

Yes

☒ No

Seal detached From IFR?

Yes

☒ NoInspection By: S. Fagler

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)Tank # 120-1Date: 11/29/14IFR Resting on Liquid?
(floating)

Yes

☒ No

Liquid on IFR?

Yes

☒ No

Tears in IFR?

Yes

☒ NoVisible Gaps Between IFR
and Outer Wall?

Yes

☒ No

Seal detached From IFR?

Yes

☒ NoInspection By: Chadley

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)

Empty



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)Tank # 120-2Date: 11/29/16IFR Resting on Liquid?
(floating)

Yes

☒ No

Liquid on IFR?

Yes

☒ No

Tears in IFR?

Yes

☒ NoVisible Gaps Between IFR
and Outer Wall?

Yes

☒ No

Seal detached From IFR?

Yes

☒ NoInspection By: Chad L.

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)

Empty

Appendix 24

Internal Inspection Forms 2018



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 15-2

Date: 2-1-18

IFR Resting on Liquid?
(floating)

Yes

~~No~~

Liquid on IFR?

Yes

~~No~~

Tears in IFR?

Yes

~~No~~

Visible Gaps Between IFR
and Outer Wall?

Yes

~~No~~

Seal detached From IFR?

Yes

~~No~~

Inspection By: *Jason Beale*

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)Tank # 15-2Date: 11-13-18IFR Resting on Liquid?
(floating)

Yes

No

Liquid on IFR?

Yes

No

Tears in IFR?

Yes

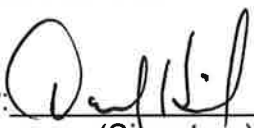
NoVisible Gaps Between IFR
and Outer Wall?

Yes

No

Seal detached From IFR?

Yes

NoInspection By: 

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)Tank # 20-1Date: 11-14-18IFR Resting on Liquid?
(floating)

Yes

☒ No

Liquid on IFR?

Yes

☒ No

Tears in IFR?

Yes

☒ NoVisible Gaps Between IFR
and Outer Wall?

Yes

☒ No

Seal detached From IFR?

Yes

☒ NoInspection By: 

(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # SS-8

Date: 10-9-18

IFR Resting on Liquid?
(floating)

Yes

☒ No

Liquid on IFR?

Yes

☒ No

Tears in IFR?

Yes

☒ No

Visible Gaps Between IFR
and Outer Wall?

Yes

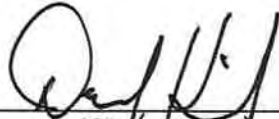
☒ No

Seal detached From IFR?

Yes

☒ No

Inspection By:


(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)



LBC Baton Rouge

Annual Internal Floating Roof Inspection

External Inspection / Internal Inspection
(Circle one)

Tank # 80-1

Date: 8-22-18

IFR Resting on Liquid? (floating)	Yes	☒ No
Liquid on IFR?	Yes	☒ No
Tears in IFR?	Yes	☒ No
Visible Gaps Between IFR and Outer Wall?	Yes	☒ No
Seal detached From IFR?	Yes	☒ No

Inspection By: 
(Signature)

Any items checked yes, other than item 1, must be reported to the Terminal Superintendent or Operations Supervisor immediately.

Comments: (note any defects observed)
