



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

C.L. "Butch" Otter, Governor
John H. Tippetts, Director

August 17, 2016

Sam Greene, Corporate Environmental Engineer
Sinclair Transportation Company, Boise Tank Farm
712 North Curtis Road
Boise, ID 83706

RE: Facility ID No. 001-00112, Sinclair Transportation Company, Boise Tank Farm, Boise
Final Permit Letter

Dear Mr. Greene,

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2007.0055 Project 61721 to Sinclair Transportation Company located at Boise to revise PTC for SVE system. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received May 20, 2016.

This permit is effective immediately and replaces PTC No. 2007.0055, issued on July 29, 2015. This permit does not release Sinclair Transportation Company from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Tom Krinke, AQ Compliance Officer, at (208) 373-0419 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Tom Burnham at (208) 373-0502 or tom.burnham@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\tb
Permit No. P-2007.0055 PROJ 61721

Enclosures

AIR QUALITY

PERMIT TO CONSTRUCT

Permittee Sinclair Transportation Company, Boise Tank Farm
Permit Number P-2007.0055
Project ID 61721
Facility ID 001-00112
Facility Location 712 North Curtis
Boise, Idaho 83706

Permit Authority

This permit (a) is issued according to the “Rules for the Control of Air Pollution in Idaho” (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued August 17, 2016



Tom Burnham, Permit Writer



Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

- 1.1 This is a revised permit to construct (PTC) to update the Thermal/Catalytic Oxidizer operating conditions.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct No. P-2007.0055, issued on 7/29/2015.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	Tanks 401, 404, 411, and 421: <ul style="list-style-type: none"> • Floating roof • Store gasoline or distillate fuel oil • 840,000 gallon capacity each 	None
2	Tank 431: <ul style="list-style-type: none"> • Floating roof • Store gasoline or distillate fuel oil • 3,336,000 gallon capacity 	None
2	Tanks 402, 405, and 406: <ul style="list-style-type: none"> • Fixed roof • Stores distillate fuel oil • 840,000 gallon capacity each 	None
2	Tank 400 (Transmix tank): <ul style="list-style-type: none"> • Fixed roof • Stores gasoline, distillate fuel oil, and/or "slop oil" • 105,000 gallon capacity 	None
3	Soil Vapor Extraction System	Thermal/Catalytic Oxidizer <ul style="list-style-type: none"> • Intellishare Model1000 • >99% VOC destruction • Flowrate: 1000SCFM

[8/17/2016]

2 Petroleum Products and Additive Storage Tanks

2.1 Process Description

Petroleum product storage consists of nine aboveground tanks of various capacities, throughputs, and design. The fuel media consists of gasoline and distillate fuel oil. The maximum potential emission from any one of these tanks occurs when the fuels are loaded, stored, and unloaded at their defined maximum throughputs.

Emission Limits

2.2 Emission Limits

The VOC and HAP emissions of the storage and associated tanks shall not exceed the corresponding emissions rate limits listed in Section 4. Annual emissions limits are based on any consecutive 12-month period.

[7/22/2014]

Operating Requirements

2.3 Throughput Limits

- The throughput of petroleum products to the storage and associated tanks shall not exceed any corresponding throughput limit listed in Section 5. Annual through-put limits are based on any consecutive 12-month period.
- The petroleum products stored in the storage and associated tanks shall be limited to the product type listed in Section 5.

[7/22/2014]

Monitoring and Recordkeeping Requirements

2.4 Throughput Monitoring

The permittee shall continuously monitor and record, in U.S. gallons, the through-put of petroleum products to the storage and associated tanks to demonstrate compliance with Permit Condition 2.3. Records of this information shall be maintained in accordance with Permit Conditions 2.11 and 2.12.

2.5 Product Monitoring

The permittee shall continuously monitor and record the type of petroleum product delivered to the storage and associated tanks. Records of this information shall be maintained in accordance with Permit Conditions 2.11 and 2.12.

2.6 Floating Roof Inspection

- The permittee shall visually inspect the floating roof(s) on all floating roof tanks at least once every two years. Seals/gaskets shall be inspected for integrity and fit to assure a vapor barrier. The inspections shall assure that the floating roof(s) are maintained in good working order and operated as efficiently as practicable in accordance with Permit to Construct General Provision 6.2.
- The permittee shall maintain records of the floating roof seals/gaskets inspections of the floating roof tanks. The records shall specifically address the seals/gaskets integrity and fit to assure a vapor barrier. The records shall also include a description of any maintenance performed and shall be maintained on-site for a period of five years and made available to DEQ representatives upon request.

2.7 Operations Manual

The permittee shall have an operations manual that addresses the operation, maintenance, and repair of each petroleum product storage and associated tanks listed in Section 4. The operations manual shall be updated and shall include the most recent general description of the equipment; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions guidelines; and corrective action procedures.

[7/22/2014]

2.8 Fugitive Emissions

All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, consideration will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

[7/22/2014]

2.9 Odors

No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

2.10 Excess Emissions

The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets, and breakdowns.

2.11 Reports and Certifications

Air Quality Permit Compliance
Boise Regional Office
Department of Environmental Quality
1445 N. Orchard
Boise, ID 83706-2239
Phone: (208) 373-0550
Fax: (208) 373-0287

2.12 Monitoring and Recordkeeping

The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

2.13 Sulfur Content

No person shall sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 1 fuel oil – 0.3% by weight.
- ASTM Grade 2 fuel oil – 0.5% by weight.
- Residual fuel oil (ATSM grade 4, 5, and 6) – 1.75% by weight.

The permittee shall establish compliance with the limits specified by fulfilling either of the requirements below. The permittee shall, contemporaneously with making a change from one option to another, record the change and maintain the records.

- The permittee shall determine the sulfur content of each shipment of distillate fuel received by the facility. The reference test method for measuring fuel sulfur content shall be ASTM method D-7039-04 Standard Test Method for Sulfur in Gasoline and Diesel Fuel by Monochromatic Wavelength Dispersive X-ray Fluorescence Spectrometry, or such comparable and equivalent method approved EPA and thus in accordance with IDAPA 58.01.01.157.02.d. Test methods and procedures shall comply with IDAPA 58.01.01.157. The results of each test performed shall be recorded and the records maintained in accordance with Permit Conditions 2.11 and 2.12.
- The permittee shall obtain documentation of the sulfur content analysis of each shipment of distillate fuel from the refinery that produced the fuel. The documentation shall clearly state the sulfur content in weight percent of sulfur present in the fuel sample and shall reference the method of analysis used to determine the sulfur content in the fuel oil.

[7/22/2014]

3 Soil Vapor Extraction System

3.1 Process Description

The Soil Vapor Extraction (SVE) system is used to remediate subsurface water contaminated with petroleum hydrocarbons. Subsurface piping connects the extraction points (i.e. extraction wells) to the equipment where they are manifolded into a single line. A regenerative blower is utilized to withdraw the vapors from the soil and sends them to a Thermal/Catalytic Oxidizer for destruction. Products of combustion from the Thermal/Catalytic Oxidizer are vented to atmosphere via the SVE system stack.

3.2 Control Device Description

When required, the VOC and HAP emissions from the SVE system stack are controlled by a Thermal/Catalytic Oxidizer prior to discharge to the atmosphere. The Thermal/Catalytic Oxidizer is designed to operate in catalytic mode or thermal (i.e. non-catalytic) mode.

Emission Limits

3.3 Emission Limits

- The VOC and HAP emissions from the SVE system stack shall not exceed the ton per year values listed in Section 4 on a 12-month rolling average basis.
- Benzene emissions from the SVE system stack shall not exceed an emission rate of 0.17 lb/hr on a monthly basis.

[7/22/2014]

Operating Requirements

3.4 Thermal/Catalytic Oxidizer Operation

- When operating in catalytic mode the Thermal/Catalytic Oxidizer shall be operated at a temperature of 600°F or higher.
- When operating in thermal mode, the Thermal/Catalytic Oxidizer shall be operated at a temperature of 1400°F or higher.

[8/17/2016]

3.5 Thermal/Catalytic Oxidizer, Standby Operation

- The Thermal/Catalytic Oxidizer shall be in operation at all times when the amount of benzene entering the SVE system (uncontrolled emissions) is greater than or equal to 0.17 lb/hr on a monthly basis.
- The Thermal/Catalytic Oxidizer may be switched to standby if the amount of benzene entering the SVE system (uncontrolled emissions) is less than 0.17 lb/hr on a monthly basis.

[8/17/2016]

3.6 Monthly VOC and HAP Source Test

The permittee shall test for VOC and HAP emissions from the SVE system exhaust stack once per month using Method 18. The monthly source tests required by this section are not subject to the notification requirements of Section 6.7 and not subject to the reporting requirements of Section 6.9.

[8/17/2016]

Monitoring and Recordkeeping Requirements

3.7 Low-Temperature Shutoff

- When operating in catalytic mode, the Thermal/Catalytic Oxidizer low-temperature shutoff shall be at least 600°F and documented in the O&M manual.
- When operating in thermal mode, the Thermal/Catalytic Oxidizer low-temperature shutoff shall be at least 1400°F and documented in the O&M manual.

[8/17/2016]

3.8 Monitor Operating Parameters

- The permittee shall monitor and record the results of each monthly Method 18 source test to demonstrate compliance with Permit Condition 3.6. Records of this information shall be maintained in accordance with Permit Condition 2.12.
- When in operation, the operating temperature of the Thermal/Catalytic Oxidizer shall be monitored and recorded once per month. Records of this information shall be maintained in accordance with Permit Condition 2.12.

3.9 Operations and Maintenance Manual Requirements

Within 60 days of issuance of this permit, the permittee shall update the O&M manual for the newly upgraded Thermal/Catalytic Oxidizer. The O&M manual shall address the operation, maintenance, calibration, and repair of the SVE system and the Thermal/Catalytic Oxidizer. The O&M manual shall be updated and shall include the most recent general description of the equipment; normal operating conditions and procedures; startup, shutdown, standby, and maintenance procedures; upset conditions guidelines; and corrective action procedures. The SVE system and Thermal/Catalytic Oxidizer shall comply with General Provision 6.11 and the manufacturer air pollution control device specifications.

[8/17/2016]

4 Summary of Annual Facility Emission Limits

The following table provides the emission rate limits for specific sources regulated in this permit:

Table 4.1 Emission Rate Limits

Source Description	VOC	Aggregated HAPs
	T/yr	T/yr
Tank 401	12.96	0.382
Tank 404	12.96	0.382
Tank 411	12.96	0.382
Tank 421	12.96	0.382
Tank 431	13.88	0.396
Tank 402	0.47	0.015
Tank 405	0.47	0.015
Tank 406	0.47	0.015
Tank 400 (Transmix tank)	0.28	0.008
Fugitive emissions	0.92	0.149
Soil Vapor Extraction system	25.88	9.37
Total	94.21	11.496

a As determined by a pollutant-specific U.S. EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

b As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

5 Summary of Annual Facility Throughput Limits

The following table provides the emission rate limits for specific sources regulated in this permit:

Table 5.1 Allowable Petroleum Product Throughput Limits and Product Types

Source Description	Throughput ^a (U.S. gallons/year)	Product Type
Tank 401	58,254,000	Gasoline or distillate fuel oil
Tank 404	58,254,000	Gasoline or distillate fuel oil
Tank 411	58,254,000	Gasoline or distillate fuel oil
Tank 421	58,254,000	Gasoline or distillate fuel oil
Tank 431	58,254,000	Gasoline or distillate fuel oil
Tank 402	168,630,000	Distillate fuel oil
Tank 405	168,630,000	Distillate fuel oil
Tank 406	168,630,000	Distillate fuel oil
Tank 400 (Transmix tank)	38,080	Gasoline, distillate fuel oil and/or "slop oil"

- a Allowable throughput is to be determined on a 12-month rolling basis with compliance and recordkeeping data compiled on a monthly basis.

6 General Provisions

General Compliance

6.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the “Rules for the Control of Air Pollution in Idaho.” The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the “Rules for the Control of Air Pollution in Idaho,” and the Environmental Protection and Health Act (Idaho Code §39-101, et seq.)

[Idaho Code §39-101, et seq.]

6.2 The permittee shall at all times (except as provided in the “Rules for the Control of Air Pollution in Idaho”) maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]

6.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

6.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee’s premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

6.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

6.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 6.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.
- 6.8 All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.
- 6.9 Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

- 6.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

- 6.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

- 6.12 All documents submitted to DEQ—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

- 6.13 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

- 6.14 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

- 6.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

- 6.16 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/94]