

Construction Permit Source Analysis & Technical Review

Company	Magellan Pipeline Company, L.P.	Permit Number	180764
City	Hockley	Project Number	395119
County	Harris	Regulated Entity Number	RN110564093
Project Type	Initial	Customer Reference Number	CN605367739
Project Reviewer	Michael Gervasi	Received Date	July 7, 2025
Site Name	Northwest Houston Terminal		

Project Overview

Magellan Pipeline Company, L.P. (Magellan) has applied for a minor source application for the Northwest Houston Terminal which is a bulk petroleum product storage and product distribution. Magellan proposed the construction of all equipment to be located at the Northwest Houston Terminal including storage tanks, unloading and loading operations with associated vapor recovery unit (VRU), fugitive piping components, and maintenance, startup and shutdown (MSS) activities with associated vapor combustion unit (VCU). MSS emissions will be authorized in this permit.

Emission Summary

Air Contaminant	Proposed Allowable Emission Rates (tpy)
PM	0.01
PM ₁₀	0.01
PM _{2.5}	0.01
VOC	22.60
NO _x	0.17
CO	0.15
SO ₂	0.01
HAPs	< 25.00

Compliance History Evaluation - 30 TAC Chapter 60 Rules

A compliance history report was reviewed on:	July 22, 2025
Site rating & classification:	0.00 / Unclassified
Company rating & classification:	0.06 / High
Has the permit changed on the basis of the compliance history or rating?	No
Did the Regional Office have any comments? If so, explain.	N/A

Public Notice Information

Requirement	Date
Legislator letters mailed	7/11/2025
Date 1 st notice published	8/20/2025
Publication Name: The Waller Times	
Pollutants: carbon monoxide, nitrogen oxides, hazardous air pollutants, organic compounds, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less and sulfur dioxide.	
Date 1 st notice Alternate Language published	8/21/2025

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Publication Name (Alternate Language): El Perico	
1 st public notice tearsheet(s) received	8/25/2025
1 st public notice affidavit(s) received	8/25/2025
1 st public notice certification of sign posting/application availability received	9/23/2025
SB709 Notification mailed	11/24/2025
SB709 Notification re-mailed	2/20/2026
Date 2 nd notice published	TBD
Publication Name:	
Pollutants:	
Date 2 nd notice published (Alternate Language)	TBD
Publication Name (Alternate Language):	
2 nd public notice tearsheet(s) received	TBD
2 nd public notice affidavit(s) received	TBD
2 nd public notice certification of sign posting/application availability received	TBD

Public Interest

Number of comments received	83
Number of meeting requests received	8
Number of hearing requests received	2
Date meeting held	TBD
Date response to comments filed with OCC	TBD
Date of SOAH hearing	TBD

Federal Rules Applicability

Requirement

Subject to NSPS? **Yes**

Subparts **A, Kc, & XXa**

Subject to NESHAP? **No**

Subparts **N/A**

Subject to NESHAP (MACT) for source categories? **Yes**

Subparts **A & BBBB**

Nonattainment review applicability: This site is a new, minor source located in Harris County, which is designated as severe nonattainment for ozone as of November 7, 2022. The proposed emissions for this project do not exceed the major source thresholds. Site-wide emissions are less than 25 tpy for NOx and VOC therefore, therefore nonattainment review is not applicable.

Project Major Source Determination

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Criteria Pollutant or Precursor	Project Emissions Increase (tpy)	Major Source Threshold (tpy)	Project Emissions Increase $\geq$ Threshold?
Ozone (as VOC)	22.60	25	No
Ozone (as NOx)	0.17	25	No

PSD review applicability: The site is a new, named source. The proposed emission rates of all pollutants are less than their respective PSD thresholds of 100 tpy. Therefore, PSD review is not applicable.

PSD Major Source Review Applicability	PM	PM ₁₀	PM _{2.5}	CO	NO _x	SO ₂	Ozone (VOC)
Proposed Project Emissions (tpy)	0.01	0.01	0.01	0.15	0.17	0.0004	22.60
PSD Major Source Threshold (tpy)	100	100	100	100	100	100	100
Further review triggered for regulated pollutants?	No	No	No	No	No	No	No

Title V Applicability - 30 TAC Chapter 122 Rules

Requirement

Title V applicability: This site is not a Title V major source under 30 TAC Chapter 122.

Periodic Monitoring (PM) applicability: This site is not subject to PM under 30 TAC Chapter 122 however, PM for the permit is as follows:

Emission Source	SC No.	PM Condition Summary
Storage and loading of petroleum products	7	Maintain 12-month loading rack throughput records that are updated on a monthly basis for each product loaded.
	10	Obtain RVP data provided by the delivery refinery for each batch of gasoline delivered to the terminal by pipeline. Records of gasoline RVP data shall be reduced to monthly weighted averages for purposes of determining compliance.
	11	Recordkeeping of benzene content for all grades of gasoline
Fugitives	14	Monthly audio, olfactory, and visual (AVO) checks and recordkeeping of leaks.
Truck Loading Lines	15	Visual inspection of all lines and connectors prior to truck loading.
VRU	20	Records of the corrective action taken following VRU alarm shall be maintained at the terminal site.
	21	Stack sampling and other testing to demonstrate compliance with the MAERT and Special Conditions.
	22	Continuous Emission Monitoring (CEMS) is installed to measure and record the in-stack concentration of VOC
Tank Roof Landings	24 & 25	The occurrence of each roof landing and the associated emissions shall be recorded, and the rolling 12-month tank roof landing emissions shall be updated on a monthly basis
Vacuum and Air Mover	17 & 27	Recordkeeping of vacuum every 15 minutes of drum loading, liquid level, VOC partial pressure, and volume of truck.
Carbon Adsorption System (CAS)	28A	Sampling once every hour of CAS run time. Recordkeeping requirements.
VCU	28B	Continuous monitoring of pilot flame by a thermocouple or an infrared monitor.

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Compliance Assurance Monitoring (CAM) applicability: This site is a minor source and therefore CAM is not applicable under 30 TAC Chapter 122.

Process Description

Primary terminal operations will include bulk petroleum product storage and product distribution. The terminal will receive diesel gasoline, and ethanol via pipeline into floating-roof storage tanks. Gasoline additives will be received by truck and unloaded into fixed-roof storage tanks. Products will be transferred out of the terminal via pipeline or tank truck.

The truck loading rack will consist of four spots for vacuum loading with a collection efficiency of 98.7%. Loading will be controlled by a VRU with a 99% destruction efficiency and equipped with a CAS that operates at 1 mg of VOC emissions per liter of gasoline loaded. The air mover and vacuum mover assist in loading operations when pressure differentials are needed to assist loading. Air mover and vacuum mover emissions calculated based on loading loss equation methodologies in AP-42, Chapter 5.2 Transportation and Marketing of Petroleum Liquids - July 2008

Both fixed-roof and floating-roof storage tanks used AP-42 Section 7.1 (October 2024) calculation methodologies for long-term emission rates. Short-term emission rates for floating roof tanks are calculated using AP-42 Section 7 equations using maximum temperature and vapor pressure per TCEQ guidance document Short-term Emissions from Floating Roof Storage Tanks (APDG 6419v2, 02/20). Short-term emission rates for fixed roof storage tanks are calculated using the methodology referenced in the TCEQ guidance document Estimating Short Term Emission Rates from Fixed Roof Tanks (APDG 6250v3, 02/20).

Product Tank Cap (EPN TANKCAP) was calculated by adding up all the floating-roof tanks annual emissions when storing product with highest emission rates (gasoline). Additive Tank Cap (EPN ADDCAP) was calculated by adding up all the fixed-roof tanks annual emissions from storing gasoline-additive (the only product they are authorized to store).

The fugitive emissions from piping components and ancillary equipment are estimated using methods outlined in TCEQ's Air Permit Technical Guidance for Chemical Sources: Fugitive Guidance, June 2018 (APDG 6422). Fugitive components will be in petroleum service and emissions are calculated based on Petroleum Marketing Terminal (PMT) emission factors.

MSS activities will occur periodically, including tank roof landings and temporary transfer operations. MSS emissions will be controlled, as needed, by a VCU with a control efficiency of 99%. The VCU is portable and temporary control device brought on site only for MSS control purposes with an operational limit of 432 hours on a rolling 12-month average. Tank roof landings do not require routing to a VCU when all standing liquid has been removed from the tank or the liquid remaining in the tank has a VOC partial pressure less than 0.02 psia as is standard practice.

Project Scope

Magellan is proposing to construct and operate eleven storage tanks, unloading and loading operations with associated VRU, fugitive piping components, MSS activities with associated VCU.

New SC No.	Description of Change
1	Standard TCEQ boilerplate language for the scope of the permit that specifies that the permit only authorizes the sources listed in the MAERT.
2	Standard TCEQ boilerplate language related to unauthorized non-fugitive emissions from relief valves, safety valves, or rupture discs of gases containing volatile organic compounds (VOC) at a concentration greater than 1 weight percent.
3	Standard TCEQ boilerplate language related to federal applicability that includes 40 CFR 60 Subparts A, Kc, & XXa.
4	Standard TCEQ boilerplate language related to federal applicability that includes 40 CFR 63 Subparts A & BBBB.
5	Reworked TCEQ boilerplate language related to recordkeeping for bulk fuel terminals. Boilerplate cites 40 CFR § 63.420(a)(1) but company cited a(2) as they are taking exemption of a(2) and the associated

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	recordkeeping requirements that are not specified in 40 CFR 63 Subpart R.
6	Standard TCEQ boilerplate language related to vapor combustion. The site will use propane for combustion as opposed to natural gas.
7	Standard TCEQ boilerplate language related to storage tank withdrawal/fill rates.
8	Standard TCEQ boilerplate language related to storage tank control requirements.
9	Standard TCEQ boilerplate language related to RVP limits for gasoline terminals located in Harris County
10	Standard TCEQ boilerplate language related to demonstrating compliance with RVP limits.
11	Standard TCEQ boilerplate language related to limits on benzene content of any grade of gasoline processed at the terminal.
12	Language limiting additive tanks refill time to between 7am and 7pm. Added based on modeling representations.
13	Language limiting additive tanks to only be filled one at a time on a 1-hr basis. Added based on modeling representations.
14	Standard TCEQ boilerplate language related to the fugitive monitoring requirements for the 28PET LDAR program.
15	Standard TCEQ boilerplate language related to truck loading connector inspections.
16	Standard TCEQ boilerplate language related to truck loading vapor tightness testing.
17	Standard TCEQ boilerplate language related to vacuum loading operations.
18	Standard TCEQ boilerplate language related to truck loading vapor collection.
19	Standard TCEQ boilerplate language related to the emission limit for VOC emissions from VRU at a gasoline terminal.
20	Standard TCEQ boilerplate language related to emission standards and operating specifications for gasoline terminals. The boilerplate VRU alarm concentration values are based on a limit of 10 mg VOC/ liter of gasoline loaded; however, the applicant represented that the VRU will achieve 1 mg VOC/ liter of gasoline loaded. As a result, the alarm concentration values were adjusted downward by a ratio of 0.1 to correspond with the limit of 1 mg VOC/liter of gasoline loaded.
21	Standard TCEQ boilerplate language related to initial compliance via stack sampling (and subsequent stack testing when requested by the TCEQ Executive Director).
22	Standard TCEQ boilerplate language related to continuous compliance for continuous emission monitoring system (CEMS) that applies to VOC from the VRU (EPN VRU).
23	Standard TCEQ boilerplate permit language related to planned MSS activities and recordkeeping.
24	Standard TCEQ boilerplate permit language related to planned MSS activities for internal floating roof storage tanks.
25	Standard TCEQ boilerplate permit language related to planned MSS activities for fixed roof storage tanks.
26	Standard TCEQ boilerplate permit language related to planned MSS activities that specifies instrument/detector measurements for VOC concentrations.
27	Standard TCEQ boilerplate language related to planned MSS activities for vacuum loading operations.
28	Standard TCEQ boilerplate permit language related to control devices for emissions from planned MSS activities. Added language limiting VCU operation to 432 hours based on modeling representations.
29	Recordkeeping requirements specifying that records shall be maintained for at least five years to demonstrate compliance with the Special Conditions and MAERT limits.
Attachment A	Standard TCEQ boilerplate attachment related to storage tank loading/withdraw rates for authorized products at gasoline terminals.
Attachment B	Standard TCEQ boilerplate attachment that summarizes MSS activities at the site.

Best Available Control Technology

Source Name	EPN	Best Available Control Technology Description
Product Tank 1 - 6	Tank 1 - 6	VOC: The TCEQ Tier 1 BACT guidelines for storage tanks, internal floating roof with TVP <11.0 psia is a white or aluminum exterior and drain dry design. For tank seals TCEQ

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		accepts Alternative 1: Primary seal mechanical or liquid mounted or Alternative 2: Primary seal vapor mounted, and secondary seal rim mounted. The company represented white exteriors, drain dry design, a mechanical primary seal, and rim mounted secondary seal. This meets Tier 1 BACT. MSS: The TCEQ Tier 1 BACT guidelines for internal floating roof MSS operations is route to appropriate control device when degassing. Control must be maintained until the VOC concentration is less than 10,000 ppmv VOC (or equivalent for non-VOCs). If there is any standing liquid within the tank, and the tank is opened to the atmosphere or ventilated, the vapor stream must be controlled until there is no standing liquid or the VOC vapor pressure is less than 0.02 psia. Route to control device during roof refloating if emissions from filling tanks without degassing and cleaning is > 5tpy. In this case, if controlling through fixed roof vent, route to control device during entire tank refill. New tanks must be designed to be drain dry with connections to control vapors under a landed roof. Commence under-roof degassing within 24 hours of landing. Degas every 24 hours unless no standing liquid in tank or vapor pressure of liquid in tank has a VOC partial pressure <0.02 psi. The applicant represented the tank will be designed to be drain dry with connections to control vapors under a landed roof and emissions will be routed to a VCU. Controlled degassing must be maintained until the VOC concentration is less than 10,000 ppmv. If there is any standing liquid within the tank, and the tank is opened to the atmosphere or ventilated, the vapor stream must be controlled until there is no standing liquid or the VOC vapor pressure is less than 0.02 psia per SC No 24. Degassing of the vapor space under the floating roof must begin within 24 hours of landing and degassing must be performed every 24 hours unless no standing liquid is in the tank or vapor pressure of the liquid in the tank is <0.02psi. This meets Tier 1 BACT.
Additive Tank ADD-1 - 5	ADD-1 - 5	VOC: Tier I BACT guidelines for fixed roof tanks with a capacity less than 25,000 gallons or storing material <0.5 psia is use of a fixed roof with submerged fill. Uninsulated exterior surfaces must be white or aluminum. The company represented submerged fill pipes and white exteriors. This meets Tier 1 BACT MSS: Tier 1 BACT guidelines for fixed roof tanks with a capacity less than 25,000 gallons or storing material <0.5 psia MSS is to send liquid to a covered vessel. If there is any standing liquid within the tank, and the tank is opened to the atmosphere or ventilated, the vapor stream must be controlled until there is no standing liquid or the VOC vapor pressure is less than 0.02 psia. Control device must meet BACT. The company represented liquid sent to a covered vessel. If there is any standing liquid within the tank, and the tank is opened to the atmosphere or ventilated, the vapor stream will be controlled by a VCU until there is no standing liquid or the VOC vapor pressure is less than 0.02 psia. This

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		meets Tier 1 BACT.
OWS Sump	SUMP-1	Tier I BACT guidelines for fixed roof tanks with a capacity less than 25,000 gallons or storing material <0.5 psia is use of a fixed roof with submerged fill. Uninsulated exterior surfaces must be white or aluminum. The company represented submerged fill pipes and white exteriors. This meets Tier 1 BACT.
Truck Loading Vapor Recovery Unit	VRU	Truck Loading: Tier I BACT guidelines for truck loading VOC with VP greater than or equal to 0.5psia is to be routed to a VOC control device and meet the specific device requirements. 98.7% collection efficiency for annual NSPS XX leak check. The company represented vacuum loading routed to a VRU (& regenerative carbon adsorption unit) meeting NSPS XXa requirements and a 98.7% collection efficiency. This meets Tier 1 BACT. Vapor Recovery Unit: Tier I BACT guidelines for a vapor recovery unit is 99% destruction efficiency, temperature monitoring and initial stack test. The company represented a 99% destruction efficiency, temperature monitoring, and initial stack testing requirements. This meets Tier 1 BACT. Regenerative Carbon Adsorption Unit: Tier I BACT guidelines for a regenerative carbon adsorption system is a minimum of two carbon canisters in parallel; continuous emissions monitor (CEM) on the carbon bed outlet vent(s), monitor for vacuum during regeneration. Breakthrough concentration 20-100 ppm based on vendor representations for specific compounds; automatic alarm if breakthrough is approached; automatic shutdown if breakthrough occurs. The company represented a continuous emissions monitor (CEM) on the carbon bed outlet vent(s), monitor for vacuum during regeneration. Breakthrough concentration 100 ppm for specific compounds; automatic alarm if breakthrough is approached; automatic shutdown if breakthrough occurs. This meets Tier 1 BACT.
Ethanol Unloading Disconnects	UNLD	Please see Truck Loading BACT under the VRU.
Piping Fugitives	FUG	Tier I BACT guidelines for fugitives with uncontrolled VOC emissions less than 10 tpy is none. The company represented monthly inspections per 28PET AVO program. This meets Tier 1 BACT.
Uncontrolled MSS Emissions	MSS-U	Tier 1 BACT guidelines for internal floating roof MSS operations is to route to a control device until the VOC concentration is less than 10,000 ppmv VOC (or equivalent for non-VOCs). The company represented that control will be maintained until the VOC concentration is less than 10,000 ppmv VOC.
Controlled MSS Emissions	MSS-C	Tier I BACT guidelines for vapor combustor units is a 99% destruction efficiency, temperature monitoring, and initial stack testing. The company represented a 99% destruction efficiency, and temperature monitoring. The VCU is a temporary, portable facility so rented units cannot be stacked tested by Magellan. Subject to a 432-hour limit on a rolling 12-month average (SC 28B(3)).

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MSS Air Mover and Vacuum Mover	VAC	For MSS vacuum truck loading, Tier I BACT is the same as routine truck loading Tier I BACT, which is submerged or bottom loading with no splash loading for liquids loaded with a vapor pressure of less than 0.5 psia. The vacuum loading will be submerged or bottom loading with no splash loading for liquids loaded with a vapor pressure of less than 0.5 psia. This meets Tier I BACT.
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Impacts Evaluation

Was modeling conducted?	Yes	Type of Modeling:	AERMOD Version 24142
Is the site within 3,000 feet of any school?	No		
Additional site/land use information: Mix of residential, commercial, and undeveloped, rural land			

Land use for the model was low roughness and elevated terrain. For the worst-case determinations, a unitized emission rate of 1 lb/hr and 1 tpy was used to predict a generic short-term and long-term impact for each source, respectively. The generic impact was multiplied by the proposed pollutant specific emission rates to calculate a maximum predicted concentration for each source.

For the short-term gasoline analysis, the applicant split the MSS emissions and routine emissions into two separate source groups. The routine emissions impact (5935.02 $\mu\text{g}/\text{m}^3$) is the culpable impact driving the exceedances for 1-hr gasoline, and the MSS emissions impact (139.62 $\mu\text{g}/\text{m}^3$) by itself does not cause an exceedance of the short-term gasoline ESL. The result reported in Tables 4 and 5 is the impact of all sources (i.e., routine and MSS combined) operating simultaneously.

The air quality analysis is acceptable for all review types and pollutants. The modeling results are shown in the following tables from ADMT memo 9964 and Tox Control No. 7891:

Table 1. Site-Wide Modeling Results for State Property Line

Pollutant	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$)	Standard ($\mu\text{g}/\text{m}^3$)
SO ₂	1-hr	0.95	715

Table 2. Modeling Results for Minor NSR De Minimis

Pollutant	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$)	De Minimis ($\mu\text{g}/\text{m}^3$)
SO ₂	1-hr	0.05	7.8
PM ₁₀	24-hr	6.26	5
PM _{2.5}	24-hr	6.26	1.2
PM _{2.5}	Annual	0.003	0.13
NO ₂	1-hr	11.5	7.5
NO ₂	Annual	0.05	1

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CO	1-hr	426.8	2000
CO	8-hr	306.4	500

Table 3. Total Concentrations for Minor NSR NAAQS (Concentrations > De Minimis)

Pollutant	Averaging Time	GLCmax (µg/m³)	Background (µg/m³)	Total Conc. = [Background + GLCmax] (µg/m³)	Standard (µg/m³)
PM ₁₀	24-hr	6.26	63	69.3	150
PM _{2.5}	24-hr	6.26	23	29.3	35
NO ₂	1-hr	11.5	75.2	86.7	188

Table 4. Minor NSR Site-Wide Modeling Results for Health Effects

Pollutant	CAS#	Averaging Time	GLCmax (µg/m³)	GLCmax Location	ESL (µg/m³)
gasoline (Vapor)	8006-61-9 (Vapor)	1-hr	5935.03	E property line	3500
gasoline (Vapor)	8006-61-9 (Vapor)	Annual	11.24	W property line	350
ethanol	64-17-5	1-hr	541.58	W property line	18800
diesel fuel #2	68476-34-6	1-hr	1286.12	S property line	1000
diesel fuel #2	68476-34-6	Annual	4.4	W property line	100
gasoline additives, generic, not otherwise specified (Vapor)	gasoline additives, generic, not otherwise specified (Vapor)	1-hr	2504.433	W property line	1000
gasoline additives, generic, not otherwise specified (Vapor)	gasoline additives, generic, not otherwise specified (Vapor)	Annual	2.53	W property line	100

Table 5. Minor NSR Hours of Exceedance for Health Effects

Pollutant	Averaging Time	1 X ESL GLCni	2 X ESL GLCmax
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gasoline (Vapor)	1-hr	55	--
diesel fuel #2	1-hr	2	--
gasoline additives, generic, not otherwise specified (Vapor)	1-hr	4	2

Table 1 shows SO₂ evaluated for state property line standards. SO₂ is below de minimis levels.

Tables 2 and 3 display NAAQS analysis results for criteria pollutants. Table 2 shows SO₂, NO₂ (annual), and CO were below de minimis levels. PM₁₀, PM_{2.5}, NO₂ (1-hr) were above de minimis levels so background concentrations were factored in. Table 3 summarizes these results, and all three pollutants pass the NAAQS standards.

Table 4 lists the health impact results for all non-criteria pollutants and where the maximum ground level concentration (GLCmax) falls in relation to the property line. Gasoline (Vapor), diesel fuel #2, and gasoline additives... (Vapor) were above the effects screening levels (ESL). The exceedances of the ESL are presented in table 5, and as a next step the three pollutants were evaluated by the TCEQ's Toxicology Department.

Gasoline (Vapor)

The modeling predicts that the short-term GLCmax/ni would be 1.7-times its short-term ESL for combined routine and MSS operations. For annual impacts, the long-term ESL was never exceeded at any receptors. The routine gasoline emissions are driven by the sump tank emissions (EPN SUMP-1) and that the emission calculations assume that the sump will be filled with gasoline as the worst-case product. There were conservative modeling assumptions such as, routine emissions of gasoline were over-predicted and the sump is filled continuously at 5 barrels per hour, for 8760 hours per year.

Toxicology provided the following reasoning: "considering the magnitude of the short-term ESL exceedance, the conservative modeling assumptions of worst-case scenarios, the facility operating limitations and restrictions including the stated annual emissions caps and truck loading limits, that the routine emissions of gasoline were over-predicted, the health-protective nature of the ESL for gasoline due to the additional margin of safety built into the ESL calculations, that the GLCs drop significantly below the ESL as one moves away from the west property line, the unlikelihood of public exposure at the location of maximum impacts, and that there were no exceedances of the long-term ESL at any receptors, the predicted short- and long-term impacts of gasoline are allowable."

Diesel fuel #2

The modeling predicts that the short-term GLCmax/ni of diesel fuel #2 would exceed its short-term ESLs by 1.3-times. The corresponding frequency of one-times ESL exceedance at the GLCmax/ni is only 2 hours per year. The long-term modeled impacts are far below the annual ESL for diesel fuel #2.

Toxicology provided the following reasoning: "the long-term modeled impacts are far below the annual ESL for diesel fuel #2. Hence, considering the magnitude and frequency of the short-term ESL exceedance, the conservative modeling assumptions of worst-case scenarios, the facility operating limitations and restrictions, that public exposure is unlikely to occur at the location of maximum impacts, and that the long-term ESL was never exceeded at any receptors, the predicted short- and long-term impacts of diesel fuel #2 are allowable."

Gasoline additives, generic, not otherwise specified (Vapor)

The modeling predicts that the short-term GLCmax/ni of gasoline additives (generic, otherwise not specified) would be 2.5-times its short-term ESL for routine plus MSS operations. However, the long-term GLCmax/ni for this chemical was far less than the long-term ESL. Additionally, there were conservative modeling assumptions such as, modeling conservatively assumed that all the tanks would be filled simultaneously whereas only one tank will fill at a time on a short-term basis.

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Toxicology provided the following reasoning: “the long-term GLCmax/ni for this chemical was far less than the long-term ESL. Therefore, considering the magnitude and frequencies of the short-term ESL exceedances, the conservative modeling assumptions of worst-case scenarios, that only one tank will fill at a time on a short-term basis whereas modeling conservatively assumed that all the tanks would be filled simultaneously, that the GLCmax/ni is located at the applicant’s property line where there is low likelihood of public exposure, the additional safety factors built into the ESL for this chemical, and the fact that the long-term impacts were below the ESL, the predicted short- and long-term impacts of gasoline additives (generic, otherwise not specified) are allowable.”

Toxicology concluded “based on the modeled representations presented to us, we do not anticipate that any short- or long-term adverse health effects will occur among the general public as a result of exposure to the proposed emissions from this facility.”

Project Reviewer
Michael Gervasi

Date

Team Leader
Matthew Ray

Date

Draft