



## **GROUP AGAINST SMOG & POLLUTION**

**1133 South Braddock Ave., Suite 1A  
Pittsburgh, PA 15218  
412-924-0604  
gasp-pgh.org**

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April 9, 2018

### **VIA EMAIL**

Allegheny County Health Department  
Air Quality Program  
301 39th St., Bldg. 7  
Pittsburgh, PA 15201  
aqpermits@alleghenycounty.us

**Re: Comments of Group Against Smog and Pollution and the  
Environmental Integrity Project, Regarding the draft Title V  
Operating Permit for Coraopolis Terminals – DE LLC  
(Permit # 0041)**

Dear Sir or Madam:

Please accept these comments regarding the draft Title V Operating Permit ((#0041) (the “Permit”) for Coraopolis Terminals – DE LLC (the “Facility”), which I am submitting on behalf of the Group Against Smog and Pollution. According to the notice posted on its website, the Allegheny County Health Department (the “Department”) is accepting comments on the Permit through April 9, 2018.

Very truly yours,

/s

John K. Baillie  
Senior Attorney

**COMMENTS OF THE GROUP AGAINST SMOG AND POLLUTION  
REGARDING THE DRAFT TITLE V OPERATING PERMIT FOR  
CORAOPOLIS TERMINALS – DE LLC (#0041)**

**I. ALL TESTING REQUIREMENTS APPLICABLE TO THE FACILITY'S  
LOADING RACKS SHOULD BE INCLUDED IN SECTION V.A.2 OF THE  
PERMIT**

Section V.A.3.h of the Permit establishes performance testing requirements for the control device that limits emissions from the Facility's Loading Racks, but is included with the Permit's monitoring requirements for the Loading Racks rather than its testing requirements for the Loading Racks. This creates confusion: when viewed on their own, the Permit's testing requirements for the loading racks are inadequate because they do not require the Facility to determine operating parameters for the control device that can be monitored to ensure compliance with applicable emissions limitations.<sup>1</sup> To avoid such confusion, the testing requirements in section V.A.3.h should be included with the testing requirements in section V.A.2.

**II. THE PERMIT SHOULD REQUIRE THE FACILITY TO REPORT THE  
RESULTS OF THE CONTINUOUS MONITORING SYSTEM FOR THE  
LOADING RACKS' VAPOR PROCESSING SYSTEM**

The Permit requires the Facility to operate a continuous monitoring system for the Loading Racks' vapor processing system,<sup>2</sup> to determine a modeled operating parameter value for that system,<sup>3</sup> and to record the data from the system.<sup>4</sup> However, the Permit does not appear to

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<sup>1</sup> See *In the Matter of Kentucky Syngas, LLC*, 2012 EPA CAA Title V LEXIS 4, \*165 (June 22, 2012) (determining that a test that is performed once every five years may be sufficient to assure compliance with the terms and conditions of a Title V Operating Permit if the Permit requires that the test be used to establish operating parameters relating to the emissions of each pollutant, and also requires that those parameters be monitored on a basis sufficient to assure compliance).

<sup>2</sup> See § V.A.3.h.

<sup>3</sup> See § V.A.3.h.1.

require the Facility to report that data.<sup>5</sup> The Permit should be revised to require the Facility to report the results of the continuous monitoring system for the Loading Racks vapor recovery system at least every six months as required by Article XXI, § 2103.12.k.1.

### **III. THE PERMIT SHOULD USE ONE TERM TO DESCRIBE THE LOADING RACKS' VAPOR RECOVERY UNIT**

Section V.A of the Permit alternately refers to a “vapor processing system,”<sup>6</sup> a “vapor collection system,”<sup>7</sup> and a “vapor recovery unit (VRU).”<sup>8</sup> It appears that these terms all refer to the same control device. Section V.A should be revised so that only one term is used consistently to describe that device.

### **IV. BASED ON THE FACILITY'S HISTORY OF VIOLATIONS OF EMISSIONS LIMITATIONS, THE PERMIT SHOULD INCLUDE A COMPLIANCE SCHEDULE**

The Facility has been required to submit its annual Title V compliance certifications every November. Through November 2016, the Facility reported frequent, and sometimes lengthy, violations of permit requirements that limit the amount of time that storage tanks' internal floating roofs may be landed rather than floating on the liquids contained by the tanks. Such violations are not insignificant: the internal floating roofs effectively reduce VOC emissions from the storage tanks when they are floating, but not when they are landed.<sup>9</sup>

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<sup>4</sup> See § V.A.4.1.

<sup>5</sup> See § V.A.5.

<sup>6</sup> See, e.g., § V.A.3.h.1).

<sup>7</sup> See, e.g., § V.A.1.a.5.

<sup>8</sup> See, e.g., § V.A.3.c.

<sup>9</sup> See Standards of Performance for New Stationary Sources; Petroleum Liquid Storage Vessels, 45 Fed. Reg. 23374, 23377 (Apr. 4, 1980).

An operating permit for a facility that has demonstrated a failure to comply with emissions limitations must include an enforceable schedule for “achieving, demonstrating, and maintaining compliance with emissions limitations.”<sup>10</sup> Even though the Facility did not report violations of the permit requirements limiting landings of the storage tanks’ internal floating roofs in its November 2017 compliance certification, its past history of violations may make a compliance schedule appropriate. Such a schedule could require, without limitation, the Facility to notify the Department when any storage tank is emptied and not immediately refilled and explain when the Facility expects to have such an empty tank refilled.

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<sup>10</sup> Art. XXI, § 2103.12.d.