TECHNICAL REVIEW DOCUMENT
for
OPERATING PERMIT 96OPAD172

to be issued to:

Sinclair Oil
Denver Products Terminal
Adams County
Source ID 0010019

Prepared by Ashley L. Kendall
March 20, 1998

I. Purpose:

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered within the Operating Permit proposed for this site. It is designed for reference during review of the proposed permit by the EPA and during Public Comment. The conclusions made in this report are based on information provided in the original application submittal of February 26, 1996, additional information received May 20, 1996, as well as a site visit and numerous discussions with the applicant. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

On April 16, 1998 the Colorado Air Quality Control Commission directed the Division to implement new procedures regarding the use of short term emission and production/throughput limits on Construction permits. These procedures are being directly implemented in all operating permits that had not started their Public Comment period as of April 16, 1998. All short term emission and production/throughput limits that appeared in the construction permits associated with this facility that are not required by a specific State or Federal standard or by the above referenced Division procedures have been deleted and all annual emission and production/throughput limits converted to a rolling 12 month total. Note that, If applicable, appropriate modeling to demonstrate compliance with the National Ambient Air Quality Standards was conducted as part of the Construction Permit processing procedures. If required by this permit, portable monitoring results and/or EPA reference test method results will be multiplied by 8760 hours for comparison to annual emission limits unless there is a specific condition in the permit restricting hours of operation.

II. Source Description:

This source is classified as a petroleum products terminal which falls into the Standard Industrial Classification 5171. Processes include fourteen (14) storage tanks for gasoline, fuel oil #1, fuel oil # 2, MTBE and ethanol. The facility also

contains a tank truck loading rack, a railcar loading rack. Emissions from the tank truck loading rack, tank # 1 and tank # 14 are controlled with a flare.

The facility is located in Henderson within the metro Denver non-attainment area for CO, PM_{10} and Ozone. This facility is within 100 km of a Class I area, Rocky Mountain National Park but there are no other states within 50 miles. The applicant certified that they are not subject to the provisions of the Section 112(r) or the Federal Clean Air Act. The source category is subject to the Gas Distribution MACT. This source, however, received a synthetic minor permit which limits their HAPs to below major source level. They are therefore not subject to the Gas Distribution MACT. This source is an existing major stationary source in an non-attainment area, which at the time of installation was grandfathered from New Source Review (NSR) requirements including LAER. The facility has one facility wide construction permit, 96AD132, which is a synthetic minor for HAPs. Facility wide emissions are as follows:

Pollutant	Potential to Emit (tpy)	Actuals (tpy)
NOX	6.0	4.2
VOC	146.5	95.21
CO	15.1	10.5
HAPs (total)	< 25.0	5.25
HAPs (individual)	< 10.0	2.38

Potential emissions are permitted limits from construction permit 96AD132 including federally enforceable limits for HAPs. Actual emissions estimates are based on the most recent APENs submitted to the Division in 1996 with the application for the synthetic minor permit.

III. Emission Sources:

The following sources are specifically regulated under terms and conditions of the Operating Permit for this Site:

S002-S013 - Twelve (12) Storage Tanks.

Emission Unit	Description	Material Stored	Size	Installation Date
S002	Fixed Roof Storage Tank	Fuel Oil	840,000	1974
S003	Fixed Roof Storage Tank	Ethanol	420,000	1963
S004	Fixed Roof Storage Tank	Fuel Oil	840,000	1974
S005	Fixed Roof Storage Tank	Ethanol	420,000	1963
S006	Fixed Roof Storage Tank	Ethanol	840,000	1966
S007	Fixed Roof Storage Tank	Fuel Oil	840,000	1974
S008	Fixed Roof Storage Tank	Fuel Oil	1,680,000	1974

S009	Internal Floating Roof Storage Tank	Gasoline/ MTBE	2,310,000	1974
S010	Internal Floating Roof Storage Tank	Gasoline	2,310,000	1974
S011	External Floating Roof Storage Tank	Gasoline	2,940,000	1978
S012	External Floating Roof Storage Tank	Gasoline	3,780,000	1978
S013	External Floating Roof Storage Tank	Gasoline	4,620,000	1982

Discussion:

1. Applicable Requirements- The storage tanks above were installed and began operation as indicated and are subject to facility wide construction permit 96AD132 with the following pertinent applicable requirements:

Visible emissions shall not exceed twenty percent (20%) opacity. (These tanks are not a source of visible emissions).

This source is subject to the odor requirements of Regulation No. 2.

This source shall be limited to a maximum throughput as listed below and all other activities, operational rates and numbers of equipment as stated in the application. Annual records of the actual consumption rate shall be maintained by the applicant and made available to the Division for inspection upon request.

Maximum gasolines, all grades combined, through the tank truck loading rack shall not exceed 306,600,000 gallons per year.

Maximum distillate fuel oils through the railcar loading rack shall not exceed 306,600,000 gallons per year.

Maximum fuel oxygenates through the tank truck loading rack shall not exceed 54,100,000 gallons per year.

Maximum throughput of gasolines, all grades combined, distillate fuel oils and additives through the tank truck loading rack shall not exceed 3.7 million gallons per day (This short term limit has been removed per policy change stated above).

Maximum throughput of distillate fuel oils through the railcar loading rack shall not exceed 2.9 million gallons per day (This short term limit has been removed per policy change stated above).

No liquids or petroleum products with a vapor pressure higher than gasoline

(10.0 psia @ 70°F) shall be stored in Tanks 9, 10, 11, 12 and 13.

No petroleum products or liquids with a higher vapor pressure than distillate fuel oil grade petroleum (0.011 psia @ 70°F) shall be stored in Tanks 2, 4, 7, and 8.

Materials with vapor pressure higher than ethanol (0.92 psia @ 70°F) shall not be stored in Tanks 3, 5 and 6.

Emissions of air pollutants shall not exceed the following limitations (as calculated in the Division's preliminary analysis):

Nitrogen Oxides: 6.0 tons per year and 124.0 pounds per day,
Volatile Organic Compounds: 146.5 tons per year and 1.0 ton per day,
Carbon Monoxide: 15.1 tons per year and 309.0 pounds per day.

The short term limits have been removed per policy change stated above.

Facility wide emissions of any individual hazardous air pollutant shall not equal or exceed ten (10) tons per year. Facility wide emissions of all hazardous air pollutants combined shall not equal or exceed twenty five (25) tons per year. Facility wide HAP emissions include emissions from "insignificant" sources as defined in Regulation No. 3, Part C.II.E.

Tanks 3, 5 and 6 are subject to Regulation number 7, III, General Requirements for Storage and transfer of Volatile Organic Compounds as follows:

a. Maintenance and Operation of Storage Tanks and Related Equipment

All storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.

Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. When an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 ppm. Testing and monitoring shall be conducted as in section VIII.C.3.

b. Transfer (excluding Petroleum liquids)

Except as otherwise provided in this regulation, all volatile organic compounds transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.

This source is subject to the Regulation to Control Emissions of Volatile Organic Compounds, Regulation No. 7, Part VI, Storage and Transfer of Petroleum Liquid. This facility must meet all applicable requirements of this section, including:

a. With the exception of tanks storing diesel fuels 1-D, 2-, 4-D and fuel oils 1, 2, 3, 4 and 5, and gas turbine fuels 1-GT through 4-GT , tanks used for storage of petroleum liquids must either have floating roof, or must be equipped with a vapor gathering and control system as stated in Regulation 7, Section VI.B.

b. This facility shall comply with all, operation and maintenance requirements, as well as the recordkeeping requirements listed in Section VI.B and VI.C.

This source is subject to the New Source Performance Standard requirements of 40 CFR 60, Subpart K as adopted in Regulation No. 6, Part A, Subpart K, Standards of Performance for Storage Vessels for Petroleum Liquids Constructed after June 11, 1973 and prior to May 19, 1978 which includes, but is not limited to the following requirements:

a. Tanks subject to this subpart must be equipped with a floating roof, a vapor recovery system or equivalent if the true vapor pressure, as stored is between 1.5 and 11.1 psia as stated in Section 60.112.

b. The tanks must be monitored as specified in Section 60.113.

This source is also subject to New Source Performance Standard (NSPS) requirements of 40 CFR 60, Subpart Ka as adopted in Regulation 6, Part A, Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction or Modification Commenced after May 18, 1978, and Prior to July 23, 1984, which includes, but is not limited to the following requirements:

a. Tanks subject to this subpart must be equipped with an internal or external floating roof, a vapor recovery system or

equivalent as specified in Section 60.112a.

b. The testing, monitoring and recordkeeping requirements of Sections 60.113a and 60.115a must be met.

In addition, the following requirements of 40 CFR 60, Subpart A as adopted in Regulation No. 6, Part A, Subpart A, General Provisions, apply.

a. No article, machine, equipment or process shall be used to conceal an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. (§ 60.12)

b. Records of startups, shutdowns, and malfunctions shall be maintained, as required under § 60.7.

APEN reporting in accordance with Regulation No.3, Part A.II.C.

This facility was moved to final approval status based on the self-certification by the source submitted to the Division on December 1, 1997 stating that the units were fully in compliance with each applicable requirement listed in their Initial Approval construction permit 96AD132.

2. Emission Factors - The emissions of air pollutants from the storage tanks are produced from the storage and transfer of products from and to the tanks. The emissions of concern are Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs). Emissions from storage tanks are generally calculated using Tanks version 3.0.

HAP Emissions

This information is listed to inform the operator of the Division's analysis of the specific compounds. This information is listed on the Division's emission inventory system.

C.A.S. #	SUBSTANCE	EMISSIONS (LB/YR)
71-43-2	Benzene	1392.5
1634-04-4	MTBE	4754.2
108-88-3	Toluene	2542.7
1634-0404	Xylenes	1806.4

3. Monitoring Plan - The source indicated in their application that they would measure tank level daily to monitor throughput into each tank to determine compliance with emission limitations. The source shall monitor throughput to each tank and sum the totals monthly. The twelve month rolling total shall be used in the VOC and HAP emission calculations. Everything that goes through the tank truck and rail loading racks is stored in the tanks. Therefore, compliance with the throughput limitations can be demonstrated by the meters on the loading racks.

4. Compliance Status - Current APENs reporting criteria pollutants and HAPs are on file with Division. The source certified to being in compliance with all applicable requirements. Therefore, these units are currently considered to be in compliance with all applicable requirements.

S001 - One (1) Lifter Roof Gasoline Storage Tank, 2,310,000 Gallon Capacity, Vented to a Flare (1963).

S014 - One (1) Fixed Roof Pipeline Overflow Storage Tank, 201,540 Gallon Capacity, Vented to a Flare (1963).

S015 - Tank Truck Loading Rack, Gasoline/MTBE, Fuel Oil and Ethanol, 41,176 Gal/hr Capacity, Vented to a Flare (1963).

Discussion:

1. Applicable Requirements- The above units were all installed and began operation in 1963. They were originally grandfathered from permitting requirements, however, when the source requested a facility wide permit in 1996 this equipment lost grandfathered status. In 1997 the source was given a facility wide permit to gain synthetic minor status for HAPs, 96AD132. The following are pertinent applicable requirements for these units:

Visible emissions shall not exceed twenty percent (20%) opacity.

This source is subject to the odor requirements of Regulation No. 2.

This source shall be limited to a maximum throughput as listed below and all other activities, operational rates and numbers of equipment as stated in the application. Annual records of the actual consumption rate shall be maintained by the applicant and made available to the Division for inspection upon request.

Maximum gasolines, all grades combined, through the tank truck loading rack shall not exceed 306,600,000 gallons per year.

Maximum distillate fuel oils through the railcar loading rack shall not exceed 306,600,000 gallons per year.

Maximum fuel oxygenates through the tank truck loading rack shall not exceed 54,100,000 gallons per year.

Maximum throughput of gasolines, all grades combined, distillate fuel oils and additives through the tank truck loading rack shall not exceed 3.7 million gallons per day (This short term limit has been removed per policy change stated above).

Throughput of off-specification or overflow products for Tank 14 shall not exceed 806,400 gallons year or 201,540 gallons per day (This short term limit has been removed per policy change stated above).

Tank 1, tank 14 and the tank truck loading rack shall be vented to a flare. The emissions from this vapor collection system are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded.

Operation of Flare:

There shall be no visible emissions from the flare, except for a maximum of 5 (five) minutes in any 2 (two) hour period of operation of the flare. Compliance shall be determined by EPA Reference Method 22.

Records of operation of the flare shall be maintained, and made available for inspection. This shall, at the minimum, contain the operational parameters (pressures, flowrates, and others relevant to the operation of the flare), "on" and "off" times of the flare, intervals of non-functioning and the reason thereof.

Flare operation shall be as per the recommendations of the manufacturers to ensure optimum operation of the flare. The emissions to the atmosphere from the loading of liquid product are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded.

As applicable, all process equipment shall be maintained and operated so that there is no leakage of air contaminants to the atmosphere prior to their treatment in the pollution control system.

No liquids or petroleum products with a vapor pressure higher than gasoline (10.0 psia @ 70°F) shall be stored in Tank 1.

Tank 14 shall be used only as a "Pipeline Relief" tank. No materials with vapor pressures higher than gasoline (10.0 psia @ 70°F) shall be stored in this tank.

Emissions of air pollutants shall not exceed the following limitations (as calculated in the Division's preliminary analysis):

Nitrogen Oxides: 6.0 tons per year and 124.0 pounds per day,
Volatile Organic Compounds: 146.5 tons per year and 1.0 ton per day,
Carbon Monoxide: 15.1 tons per year and 309.0 pounds per day.

The short term limits have been removed per policy change stated above.

Facility wide emissions of any individual hazardous air pollutant shall not equal or exceed ten (10) tons per year. Facility wide emissions of all hazardous air pollutants combined shall not equal or exceed twenty five (25) tons per year. Facility wide HAP emissions include emissions from "insignificant" sources as defined in Regulation No. 3, Part C.II.E.

This source is subject to the Regulation to Control Emissions of Volatile Organic Compounds, Regulation No. 7, Part VI, Storage and Transfer of Petroleum Liquid. This facility must meet all applicable requirements of this section, including:

a. With the exception of tanks storing diesel fuels 1-D, 2-, 4-D and fuel oils 1, 2, 3, 4 and 5, and gas turbine fuels 1-GT through 4-GT , tanks used for storage of petroleum liquids must either have floating roof, or must be equipped with a vapor gathering and control system as stated in Regulation 7, Section VI.B.

b. This facility shall comply with all, operation and maintenance requirements, as well as the recordkeeping requirements listed in Section VI.B and VI.C.

c. The loading rack must be equipped with a vapor collection and disposal system which reduces VOC emissions to no more than 80 milligrams per liter of gasoline being loaded, as well as all other requirements listed in Regulation 7, VI.C.2. (The 35

mg/L limit for the flare is more stringent then the 80 mg/L above. Therefore, for purposes of permit streamlining the 35 mg/L requirement will be incorporated into the operating permit).

APEN reporting in accordance with Regulation No.3, Part A.II.C.

2. Emission Factors - The emissions of air pollutants from the storage tanks and loading rack are produced from the storage and transfer of products from and to the tanks. The emissions of concern are Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs). Emissions from storage tanks are generally calculated using Tanks version 3.0 or higher. Emissions from the loading rack can be calculated using emission factors times throughput into the loading rack. The emission factor proposed by the source is the 35 mg/L requirement for the flare converted to lb/gallon.

3. Monitoring Plan - The source indicated in their application that they would measure tank level daily to monitor throughput into each tank. The source shall use emission factors taken from Tanks version 3.0 or higher and monthly throughputs to the tank to determine emissions. They will determine throughput into the loading rack with flowmeters to determine compliance with throughput and emission limitations.

4. Compliance Status - Current APENs reporting criteria pollutants and HAPs are on file with the Division. The source certified to being in compliance with all applicable requirements. Therefore, these units are currently considered to be in compliance with all applicable requirements.

<u>S016</u> - Railcar Fuel Oil Loading Rack, 35,000 Gal/hr Capacity (1963).

Discussion:

1. Applicable Requirements- The unit above was installed and began operation in 1963. They were originally grandfathered from permitting, however, when the source requested a facility wide permit in 1996 this equipment lost grandfathered status. It was permitted in 1997 by facility wide permit 96AD132 with the following pertinent applicable requirements for this unit:

Visible emissions shall not exceed twenty percent (20%) opacity.

This source is subject to the odor requirements of Regulation No. 2.

This source shall be limited to a maximum throughput as listed below and all other activities, operational rates and numbers of equipment as stated in the application. Annual records of the actual consumption rate shall be maintained by the applicant and made available to the Division for inspection upon request.

Maximum distillate fuel oils through the railcar loading rack shall not exceed 306,600,000 gallons per year.

Maximum throughput of distillate fuel oils through the railcar loading rack shall not exceed 2.9 million gallons per day (This short term limit has been removed per policy change stated above).

Emissions of air pollutants shall not exceed the following limitations (as calculated in the Division's preliminary analysis):

Nitrogen Oxides: 6.0 tons per year and 124.0 pounds per day,
Volatile Organic Compounds: 146.5 tons per year and 1.0 ton per day,
Carbon Monoxide: 15.1 tons per year and 309.0 pounds per day.

The short term limits have been removed per policy change stated above.

Facility wide emissions of any individual hazardous air pollutant shall not equal or exceed ten (10) tons per year. Facility wide emissions of all hazardous air pollutants combined shall not equal or exceed twenty five (25) tons per year. Facility wide HAP emissions include emissions from "insignificant" sources as defined in Regulation No. 3, Part C.II.E.

APEN reporting in accordance with Regulation No.3, Part A.II.C.

2. Emission Factors - The emissions of concern are Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) from the railcar loading rack. An emission Factor for the railcar loading rack can be calculated using the following equation from AP-42 (1/95) for VOC losses due to loading racks:

$$L\ (lb/1000gal) = 12.46 \times S \times P \times M/T = 0.0164\ lb/Mgal = 0.000164\ lb/gallon$$

Where:

L = Loading Losses
P = True Vapor Pressure (psia)
M = Molecular Weight of Vapor
T = Liquid Temperature (deg R)

3. Monitoring Plan - The source indicated in their application they would measure throughput into the railcar loading rack with flowmeters. Emission

calculations should be done monthly using the emission factor above and the monthly throughput determined from the flowmeters.

4. Compliance Status - A current APEN reporting criteria pollutants and HAPs is on file with Division. The source certified to being in compliance with all applicable requirements. Therefore, these units are currently considered to be in compliance with all applicable requirements.

<u>S017</u> - Fugitive VOC Emissions (1963).

Discussion:

1. Applicable Requirements- Fugitive VOC emissions were originally grandfathered from permitting requirements, however, when the source requested a facility wide permit in 1996 this equipment lost grandfathered status. Fugitive VOC emissions at this source are permitted by construction permit 96AD132 with the following pertinent applicable requirements:

Emissions of air pollutants shall not exceed the following limitations (as calculated in the Division's preliminary analysis):

Nitrogen Oxides: 6.0 tons per year and 124.0 pounds per day,
Volatile Organic Compounds: 146.5 tons per year and 1.0 ton per day,
Carbon Monoxide: 15.1 tons per year and 309.0 pounds per day.

The short term limits have been removed per policy change stated above.

Facility wide emissions of any individual hazardous air pollutant shall not equal or exceed ten (10) tons per year. Facility wide emissions of all hazardous air pollutants combined shall not equal or exceed twenty five (25) tons per year. Facility wide HAP emissions include emissions from "insignificant" sources as defined in Regulation No. 3, Part C.II.E.

APEN reporting in accordance with Regulation No.3, Part A.II.C.

Fugitive emissions shall be controlled by the following practices:

a. Control techniques and work practices shall be implemented at all times to reduce volatile organic compound (VOC) emissions from fugitive sources. Control techniques and work practices include, but are not limited to:

(I) tight-fitting covers for open tanks;
(ii) covered containers for solvent wiping cloths;
(iii) proper disposal of dirty clean-up solvent.

b. Emissions of organic material released during clean-up operations, disposal, and other fugitive emissions shall be included when determining total emissions, unless the source owner or operator documents that the VOC's are collected and disposed of in a manner that prevents evaporation to the atmosphere.

2. Emission Factors - Sinclair has calculated emissions from equipment leaks based on emission factors from EPA's Protocol for Emission Leak Estimates (Table 2-6 (EPA 453/R-95-017)) and AP-42, 4 ed., Table 9.1-2. Factors are multiplied by the number of components of each type (e.g. Compressor Seals).

3. Monitoring Plan - As a means of recordkeeping, an initial physical hard-count of facility components will be conducted within 90 days of permit issuance to verify existing hardware inventory. Records shall be kept of all component additions and deletions, and a running tally maintained. A physical hard-count of facility components shall be conducted every five years following the initial count required under this condition. In addition, the source shall follow the control technique and work practices listed above. Such practices shall be recorded and kept on site to be made available to the Division upon request.

4. Compliance Status - A current APEN reporting criteria pollutants and HAPs is on file with Division. The source certified to being in compliance with all applicable requirements. Therefore, these units are currently considered to be in compliance with all applicable requirements.

IV. Insignificant Activities

Fire training equipment:
Discharging fire extinguishers
Filling fire extinguishers
Fires for ERT training
Fires for fir extinguisher training

Laboratory equipment:
Analytical Equipment
Hood vents
Release of hydrocarbon from sample bombs

Maintenance - Equipment and Piping:
Line/Pipe maintenance
Valve maintenance
Hot taps
Opening lines/pipes to blind/unblind
Pump maintenance

Rotating equipment lubrication system
Steam Purges

Maintenance - Instrumentation:

Bleed from flow measurement dP lines
Opening lines for inspection of orifice plates
Zero/Span/Cal of flow measurement lines

Maintenance - Miscellaneous:

Cleaning/Changing filters/coalescors
Opening vessels
Operation of Machining Tools
Painting
Parts cleaning
Roofing
Sand blasting
Vacuum truck operations
Welding

Maintenance - Storage Tanks:

Cleaning
Opening
Painting
Sand blasting
Steam purging

Miscellaneous:

Food preparation
Lawn and plant care
Office activities

Mobile Sources:

Fueling vehicles
Vehicle cleaning
Vehicle exhaust
Vehicle maintenance
Vehicle traffic

Operations - Hydrocarbon:

Hydrocarbon spills
Relief valves
Sampling
Storage tank roof drains

Operations - Miscellaneous:

Backup fuel fired pumps/compressors/machines

Bench top tests performed by operations
Chemical injection systems
Portable fuel fired
Pumps/Compressors/Machines
Process Chemical Transfers
Steam vents and steam leaks
Support material loading/unloading/screening
Vacuum truck operations

Remediation Activities:

Hydrocarbon recovery
Well drilling

Sump:
Spill/stormwater drainage to sump

V. Alternative Operating Scenarios

No alternative operating scenarios were requested.

VI. Permit Shield

Gasoline Distribution MACT - This facility was issued a synthetic minor permit for HAPs (May 28, 1997) to qualify as an area source before the compliance date of December 15, 1997. Therefore, this source is not subject to the Gasoline Distribution MACT and this requirement will be included in the permit shield.

Colorado Regulation No. 7, Part VI.B.3. - The additive storage and blending system (insignificant activity) is exempt from this regulation because additives are stored in tanks less than 40,000 gallon capacity and their true vapor pressure is less than 1.5 psia.

Colorado Regulation No. 6, Part A, Subpart XX (40 CFR 60 Subpart XX) -This facility started operating in 1963 and no modifications have occurred after December 17, 1980. Therefore, this facility is grandfathered from the requirements of this NSPS.