ALLEGHENY COUNTY HEALTH DEPARTMENT
AIR QUALITY PROGRAM

August 13, 2025

SUBJECT: **Coraopolis Terminals – DE LLC**
Coraopolis Terminal
9 Thorn Street
Moon Township, PA 15108-0191
Allegheny County

Title V Operating Permit No. 0041-OP25

TO: JoAnn Truchan, P.E.
Program Manager

FROM: Helen O. Gurvich
Air Quality Engineer

FACILITY DESCRIPTION:

Coraopolis Terminals – DE LLC is located at 9 Thorn Street, Moon Township, Allegheny County. The facility is a bulk storage and distribution terminal for gasoline, gasoline-ethanol blends, distillates, denatured ethanol, biodiesel, and distillate-biodiesel blends operated by Lucknow-Highspire Terminals, LLC (LHT). The terminal receives bulk petroleum products, such as gasoline and distillate oil from their distribution pipeline or by barge and stores them in one of 14 aboveground storage tanks (ASTs). Gasoline and distillate products are transferred from these ASTs, upon demand, via pipelines to the terminal's tank truck loading racks (TLR) for loading into tanker trucks. The vapors from the TLR are controlled by two (2) vapor recovery units (VRUs). Distillate products may also be loaded onto barges at the terminals marine vessel loading facility (MVLF).

The facility is a major source of volatile organic compounds (VOCs) and a minor source of total particulate matter (PM), particulate matter less than 10 μm in diameter (PM_{10}), particulate matter less than 2.5 μm in diameter ($PM_{2.5}$), oxides of sulfur (SO_X), oxides of nitrogen (NO_X), and carbon monoxide (CO). It is a synthetic minor source of hazardous air pollutants (HAPs) as defined in Article XXI §2101.20.

PERMIT RENEWAL DESCRIPTION

This is a Title V renewal for Coraopolis Terminals – DE LLC, Coraopolis Terminal (LHT) located in Moon Township, Allegheny County. The original operating permit was issued on June 22, 2018. LHT has not made any physical changes or additions to any air contamination equipment since permit was issued. However, minor changes in emissions calculations and monitoring requirements are included in this renewal.

The renewal permit will include the following updates:

- The method for calculating tank emissions was changed from U.S. EPA Tanks 4.09d to Emission Master Tanks (EM Tanks).
- A minor change in the truck rack VRU monitor pressure requirements was made to reflect system operation more accurately.
- The Responsible Official has been updated.
- Heater information was updated.
- The HAP speciation for diesel (distillate) was modified.
- Emergency generator Caterpillar 3406 was included in this permit (generator was installed in June, 2005).

The Coraopolis Terminal is currently permitted as a Title V major facility for VOC emissions. Although individual group VOC emissions were shown to be similar to those in the previous application, the total facility PTE for VOCs was calculated to be slightly higher compared to the previous application. This application shows a total facility PTE of 110.09 tons with the addition of the miscellaneous sources compared to the previous permit limit of 107.64 tons. Based on Article XXI §2103.14.e, Allegheny County de minimis levels, since the increased annual VOC emissions from this recalculation are less than five (5) tons/yr at the source during the term of the permit (2.45 tons/yr), this recalculation of emissions is exempt from the requirement of an Installation permit.

PERMIT APPLICATION COMPONENTS:

1. Title V Operating Permit #0041, issued June 22, 2018
2. Renewal Title V Operating Permit application #0041, December 21, 2022
3. Stack test report, dated September 8, 2020 (Two (2) VRU)
4. Correspondence, dated April 12, 2023 (Change of Responsible Official)
5. Correspondence, dated August 28, 2024 (Butane tank)

Determinations

1. May 9, 2024: Two pressurized bullet liquid butane storage tanks
   - Request for determination received on April 29, 2024
   - Exempted from permitting; Included in Section VI of the TVOP

EMISSION SOURCES:

Emissions Sources

I.D.	Source Description	Control Device(s)	Throughput or Capacity	Fuel/Raw Material	Stack I.D.
P001	Loading Racks No. 1 & No. 2	(2) John Zink Fixed Bed Carbon Vapor Recovery Units	Combined 320,000 gal/hr	Gasoline and Distillate	S001 & S002
Storage Tanks					
T29490, T29491 T29492, T29497 T27511, T29518	Aboveground Storage Tanks	Internal Floating Roofs	1,100,000 gal to 3,690,000 gal	Gasoline, diesel, fuel oil, kerosine, or denatured ethanol	NA
T30593, T30594	Aboveground Storage Tanks	Conservation Vents	2,200,000 gal each	Diesel, fuel oil, kerosine, or denatured ethanol	NA
T-88, T-89, T-95, T-96, T-98, T-99	Aboveground Storage Tanks	Internal Floating Roofs	2, 834,685 gal to 7,219,429 gal	Gasoline, diesel, fuel oil, kerosine, or denatured ethanol	NA
T100, T101	Aboveground Storage Tanks	Fixed roof tanks	50,000 gal, 69,000 gal	Biodiesel	NA
T110 – T120	Aboveground Storage Tanks	Fixed roof tanks	1,000 gal to 8,000 gal	Additives	NA
Butane Tank 1	Aboveground Storage Tank	Fixed roof tank	20,000 gal	Butane	NA
Miscellaneous/Minor Significant Sources					
P002	Marine Vessel Loading Facility (MVLF)	none	80,000,000 gal/yr	Distillate	NA

I.D.	Source Description	Control Device(s)	Throughput or Capacity	Fuel/Raw Material	Stack I.D.
EG-001	Emergency Generator Caterpillar 3406	none	587 HP	Diesel fuel	S004
EG-002	Emergency Generator Caterpillar C15	none	619 HP	Diesel fuel	S003
B002	Heating Unit Furnaces	none	0.09 MMBTU/hr, 0.2 MMBTU/hr	Natural gas	S004
F001	Roads and Vehicles	none	NA	NA	NA
G001	Equipment Leaks	none	NA	NA	NA
NA	(2) Underground Oil/Water Separator	none	14,280 gal & 20,000 gal	NA	NA

METHOD OF DEMONSTRATING COMPLIANCE:

Compliance with the emission standards set in this permit will be demonstrated by testing of the VRUs and loading racks every five (5) years; monitoring of the carbon bed temperatures; carbon bed maximum vacuum and absorber column pressure on a weekly basis, and carbon testing every two (2) years along with monitoring, record keeping, and reporting requirements.

See operating permit No. 0041-OP25 for the specific conditions for determining compliance with the applicable requirements. Compliance with the short-term (lb/hr) limits must be maintained at all times, including startup and shutdown unless explicitly stated otherwise in the permit. Any emissions due to startup and/or shutdown are included in facility's total annual emissions.

EMISSION SOURCES OF MINOR SIGNIFICANCE:

1. The 14 aboveground vertical and horizontal storage tanks, ranging in size from 275 gallons to 8,000 gallons and storing liquid with vapor pressure less than 0.5 psia (tanks have negligible emissions of VOCs and HAPs due to negligible vapor pressure). See Appendix A of renewal Title V application for small storage tanks information.
2. The two (2) biodiesel tanks (T100 and T101) with capacities of 50,000 gallons and 69,000 gallons and vapor pressure less than 0.001 psia (tanks have negligible VOC emissions). Emissions are based on the Mitchell Scientific, Inc. Emission Master Tanks (EM Tanks) program.
3. The 14,280 gallon and 20,000 gallon underground oil/water separators have negligible emissions of VOCs and HAPs.
4. The Marine Vessel Loading Facility (MVLF) for distillate barge loading has negligible emissions of VOCs and HAPs at a maximum allowable throughput of 80 million gal/yr (see emission calculation below).
5. The 619 hp emergency generator has negligible emissions as determined by the determination request dated December 20, 2010.
6. The 587 hp emergency generator has negligible emissions and was included in this permit (generator was installed in June, 2005).
7. The two (2) natural gas fired heaters with capacity of 0.09 MM BTU/hr and 0.2 MM BTU/hr have negligible emissions due to their small capacity.
8. Fugitive VOCs and HAPs from valves, pump seals, fittings, and others are a source of minor significance with potential VOC emissions = 1.01 tons/yr and HAP = 0.10 tons/yr (see emission calculations below).
9. Potential emissions from roadways are a source of minor significance with total PM = 0.84 tons/yr (including PM_{10} and $PM_{2.5}$). See emission calculations in Appendix D of renewal TV application.

EMISSION CALCULATIONS

1. Loading Rack emission calculations:

Loading Rack Data:

Maximum throughput:	160,000gal/hr gasoline or distillate each
No. of bays:	4
Controls:	Two (2) activated carbon adsorption/absorption vapor recovery units

Vapor Recovery Unit Data:

Make:	John Zink, Co. (Two (2) identical VRUs from each loading rack)
Model:	Series 2000
Year installed:	2004
Type:	Activated carbon adsorption/absorption
No. carbon columns:	2 each
Minimum bed depth:	96" each carbon column
Alternating cycle:	15 min.
Regeneration:	Vacuum with air purge
Operating vacuum:	24" Hg during regeneration
Design Loading:	Instantaneous = 9,600 gpm each 12,000 gal/min One hour = 160,000 gallons each
Design outlet conc.	5 mg/l for each VRU
Capture efficiency:	99.4% each VRU
Recovery efficiency:	99.5% each VRU
Maximum bed ºF:	200 ºF each carbon bed

Gasoline VOC emissions:

1. The maximum allowable gasoline throughput for the loading racks is 705,000,000 gallons in any consecutive 12-month period.

2. The maximum hourly loading rate for the racks is 160,000 gallons/hr each, being limited by the capacity of the VRUs.

3. The maximum allowable VOC emissions from the VRUs are 5 mg/l, a guaranteed emission level provided by the manufacturer of the VRU (i.e., John Zink Company).

4. The estimated maximum fugitive emissions from the tanker trucks during gasoline loading is 6 mg/l.

5. Maximum potential annual VOC emissions from gasoline truck loading:

   VRUs:
   705×10^6 gal/yr $\times 5$ mg/l $\times 8.346 \times 10^{-6}$ lb·l/mg·gal = 29,419.65 lbs/yr = **14.71 tons/yr**

   Fugitive:
   705×10^6 gal/yr $\times 6$ mg/l $\times 8.346 \times 10^{-6}$ lb·l/mg·gal = 35,303.58 lbs/yr = **17.65 tons/yr**

6. Maximum potential hourly VOC emissions from gasoline truck loading:

   VRUs:

320,000 gal/hr × 5 mg/l × 8.346 × 10^{-6} lb·l/mg·gal = **13.35 lbs/hr**

Fugitive:
320,000 gal/hr × 6 mg/l × 8.346 × 10^{-6} lb·l/mg·gal = **16.02 lbs/hr**

Distillate VOC emissions:
Distillate VOC emissions calculated based on the AP-42 factors because a guaranteed emission level provided by the manufacturer of the VRU only for gasoline.

1. The maximum allowable Distillate throughput for the loading racks is 530,000,000 gallons in any consecutive 12-month period. Capture efficiency is 99.4% based on a 6 mg/l fugitive loss at the tank truck and a removal efficiency of 99.5%.

2. Maximum controlled potential annual VOC emissions from distillate truck loading:

   VRUs: (AP-42, 5.2, 1/95)
   12.46 × [(1.0 × 0.0045 psi × 130 lb/lb·mol) / (510 ºR)] = 0.0143 lbs/1000 gal
   0.0143 × (530,000,000 gal/1,000 gal) × 0.005 × 0.994 =37.67 lbs/yr = **0.019 tons/yr**

   Fugitive:
   0.0143 × (530,000,000 gal/1,000 gal) × 0.006 = 45.47 lbs/yr = **0.02 tons/yr**

3. Maximum potential hourly VOC emissions from distillate truck loading:

   VRUs:
   0.0143 × (320,000 gal/1,000 gal) × 0.005 × 0.994 = **0.02 lbs/hr**
   Fugitive:
   0.0143 × (320,000 gal/1,000 gal) × 0.006 = **0.03 lbs/hr**

Potential HAP emissions:

Individual HAPs concentrations in distillate were revised based on a review of safety data sheets. Changes in HAP concentrations have not resulted in any significant change in HAP emissions. Additionally, no change in total facility HAP concentration is requested in this permit application. Below is a comparison of the HAP concentration used in the previous Title V Permit compared to currently used values for distillate.

HAP	Distillate previous speciation	Distillate current speciation
Benzene	0.22	0.79
Ethylbenzene	0.31	2.07
Hexane	0.05	1.67
Toluene	2.39	6.91
Naphthalene	-	0.50
M-Xylene	5.73	5.83

The vapor weight fraction for each HAP in gasoline and distillate presented below were applied to the total VOC tpy and lbs/hr calculated above to calculate HAP emissions. The HAP Vapor Mass Fractions (VMFs) of gasoline are based on the "Emission Inventory Improvement Program, Gasoline Marketing (Stage I and Stage II), Volume III: Chapter 11," Revised January 2001, Table 11.3-2. For gasoline, liquid mass fraction is assumed to equal vapor mass fraction.

HAP	Vapor wt. Fraction%		Lbs/hr (for both VRU)					Tons/yr (for both VRU)				
	Gasoline	Distillate	Gasoline		Distillate		Total VRU Only	Gasoline		Distillate		Total VRU Only
			VRU Only	Fugitive	VRU Only	Fugitive		VRU Only	Fugitive	VRU Only	Fugitive	
VOCs	100.00	100.00	13.35	16.02	0.02	0.03	13.37	14.71	17.65	0.02	0.02	14.73
2,2,4-Trimethyl pentane	0.80	0.00	0.11	0.13	0.00	0.00	0.11	0.12	0.14	0.00	0.00	0.12
Benzene	0.90	0.79	0.12	0.14	0.00	0.00	0.12	0.13	0.16	0.00	0.00	0.13
Ethylbenzene	0.10	2.07	0.01	0.02	0.00	0.00	0.01	0.01	0.02	0.00	0.00	0.01
Hexane	1.60	1.67	0.21	0.26	0.00	0.00	0.21	0.24	0.28	0.00	0.00	0.24
Toluene	1.30	6.91	0.17	0.21	0.00	0.00	0.17	0.19	0.23	0.00	0.00	0.19
POM	0.05	0.00	0.01	0.01	0.00	0.00	0.01	0.01	0.01	0.00	0.00	0.01
Xylenes	0.50	5.83	0.07	0.08	0.00	0.00	0.07	0.07	0.09	0.00	0.00	0.07
Naphthalene	0.00	0.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total HAPs	5.25	17.77	0.70	0.85	0.00	0.00	0.70	0.77	0.93	0.00	0.00	0.77

2. Storage Tanks emission calculations:

In this permit application, emissions from storage tanks were calculated using the Mitchell Scientific, Inc. Emission Master Tanks (EM Tanks) program instead of U.S. EPA Tanks 4.09d program as used in the previous permit as the Tanks 4.09d program is no longer supported. Additionally, the EM Tanks program provides fixes to known errors within EPA Tanks 4.09d and has also updated the climate data that was published along with the revisions to the EPA AP-42, Chapter 7 update in 2019. Based on that, emissions from the storage tanks a little bit different from the previous permit.

The EM Tanks program was used to calculate emissions from floating roof tanks, fixed roof tanks, and additive tanks on site. EM Tanks were also used to calculate emissions from roof landings for floating roof tanks. The potential emissions were calculated assuming gasoline storage in the tanks, which represents the worst-case emissions scenario due to the higher vapor pressure of gasoline as compared to that of denatured ethanol, kerosene, diesel, no. 2 fuel oil, and biodiesel.

Emissions calculations, including output from the EM Tanks program, are provided in Attachment D of the permit renewal application.

Source	VOC	HAPs	2,2,4-Trimethyl Pentane	Benzene	Ethyl-benzene	Hexane	POM	Toluene	Xylene
Gasoline/Distillate Tanks T-88, T-89, T-95, T-96, T-98, T-99	34.12	1.31	0.273	0.087	0.026	0.426	0.017	0.341	0.127
Gasoline/Distillate Tanks T29490, T29491,T29497, 27511, T29492, T29518	37.67	1.64	0.301	0.097	0.046	0.457	0.019	0.456	0.244
Distillate Tanks T30593, T30594	2.1	0.36	0.000	0.017	0.043	0.035	0.000	0.145	0.088
Distillate Tanks T101, T102, T110-120	2.25	0.492	0.000	0.017	0.044	0.037	0.051	0.152	0.179
Total	**76.14**	**3.802**	**0.574**	**0.218**	**0.159**	**0.955**	**0.087**	**1.094**	**0.638**

3. Marine Vessel Loading

Based on VOC emission factors from AP-42, Section 5.2, maximum potential VOC emissions for marine vessel loading equal 0.12 lbs/hr or 0.52 tons/yr.

Basis: Distillate loading loss is 0.013 lbs VOC per 1,000 gallons distillate loaded.

80,000,000 gal/yr × 0.013 lbs VOC / 1,000 gal × 1 ton/2000 lb = 0.52 tons/yr
9,132 gal/hr × 0.013 lbs VOC / 1,000 gal = 0.12 lbs/hr

Emissions of HAP compounds are determined by applying worst-case vapor mass fractions to the total VOC emissions from the source. The vapor mass fractions for distillate represent the worst-case content of hazardous constituents according to LHT's Safety Data Sheet (SDS).

HAP	Vapor wt. Fraction %	VOC, tons/yr	HAP, tons/yr
Benzene	0.79	0.52	0.0041
Ethylbenzene	2.07	0.52	0.0107
Hexane	0.667	0.52	0.0035
Naphthalene	0.50	0.52	0.0026
Toluene	0.91	0.52	0.0359
Xylene	5.83	0.52	0.0303
Total HAPs	**16.76**		**0.0871**

4. Fugitive emissions from Valves, Pumps Seals, Fittings and Others:

Based on VOC emission factors (US EPA factors EPA-453/R-95-017, 1995 Protocol for Equipment Leak Emission Estimates), maximum potential fugitive VOC emissions for valves, pumps, fittings, and others (compressors/open ended lines, etc.) equal 1.01 tons/yr (see attachment D of operating permit application renewal).

The HAP emissions are dependent on whether gasoline or distillate are being conveyed, since the HAP content of gasoline is different than the HAP content of distillate products. This applies to individual HAPs as well as total HAPs. Emissions of HAP compounds are determined by applying typical vapor mass fractions

to the total VOC emissions from the source. Emissions were estimated for two scenarios: (1) handling gasoline exclusively, and (2) handling distillate exclusively. The worst case HAP emissions were taken for maximum potential emissions (the highest between gasoline and distillate) and the total HAP emissions, not the sum of the individual HAP emissions. This is the highest "total HAP" between gasoline and distillate. Maximum potential HAP emissions equal 0.10 tons/yr.

Benzene ton/yr	Ethylbenzene ton/yr	Hexane ton/yr	Toluene ton/yr	POM ton/yr	Xylene ton/yr	2,2,4-Trimethylpentane ton/yr	Total HAP ton/yr
0.01	0.000	0.02	0.018	0.01	0.02	0.005	0.10

SUMMARY OF MAXIMUM POTENTIAL VOC AND HAP EMISSIONS FROM THE FACILITY

Pollutant	Loading Rack VRU	Storage Tanks	MVLF	Others Emissions[1]	Total
	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr
VOC	**32.36**	**76.14**	**0.52**	**1.067**	**110.09**
2,2,4-Trimethylpentane	0.259	0.574	0.000	0.005	0.84
Benzene	0.291	0.218	0.0041	0.011	0.52
Ethylbenzene	0.032	0.159	0.0107	0.000	0.20
Hexane	0.518	0.955	0.0035	0.02	1.50
Toluene	0.421	1.094	0.0359	0.000	1.55
POM	0.016	0.087	0.000	0.01	0.11
Xylene	0.162	0.638	0.0303	0.02	0.85
Total HAP	**1.70**	**3.80**	**0.087**	**0.156**	**5.50**

[1] Included emission from the emergency generator, heaters, fugitives & others.

REGULATORY APPLICABILITY:

1. **Article XXI Requirements for Issuance:**
   The requirements of Article XXI, Parts B and C for the issuance of operating permits have been met for this facility. Article XXI, Part D, Part E & Part H will have the necessary sections addressed individually.

2. **Article XXI, §2105.13 Gasoline Loading Facilities:**
   This section is applicable to the facility. See Operating Permit No. 0041-OP25 for specific regulatory provisions.

3. **Testing Requirements:**
   The permittee shall test the loading process and VRUs for compliance with the requirements of Title V Operating Permit #0041-OP25, Section 60.503 of 40 CFR 60, Subpart XX, and Section 2105.13 of Article XXI, in accordance with Section 2108.02 of Article XXI and every five (5) consecutive years thereafter. Testing shall be conducted according to the procedures of 40 CFR 60.503 and section 2105.13 of Article XXI.

4. **Applicable New Source Performance Standards (NSPS):**

   40 CFR PART 60, Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 11, 1978, and Prior to July 23, 1984:
   This section is applicable to tanks T29490, T29491, T29492, T29497, T27511, and T29518 due to modifications after May 11, 1978. See Operating Permit #0041-OP25 for specific regulatory provisions.

40 CFR PART 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984:

Storage tanks T-88, T-89, T-95, T-96, T-98, and T-99 are subject to this standard due to the construction or modification of the tanks after July 23, 1984. They each have a capacity greater than 151 cubic meters (m^3), and they are all used to store volatile organic liquids with a vapor pressure greater than 3.5 kPa. See Operating Permit #0041-OP25 for specific regulatory provisions.

40 CFR 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals That Commenced Construction, Modification, or Reconstruction After December 17, 1980, and On or Before June 10, 2022:

The total of all gasoline loading racks at the facility are affected units under Subpart XX due to the replacement of the new VRU in 2004. See the Operating Permit #004-OP25 for specific regulatory provisions.

40 CFR 60, Subpart XXa, Standards of Performance for Bulk Gasoline Terminals That Commenced Construction, Modification, or Reconstruction After June 10, 2022:

The total of all gasoline loading racks at the facility are affected units under Subpart XXa due to the installation of the new pressurized bullet liquid butane storage tank in 2024. See the Operating Permit #0041-OP25 for specific regulatory provisions.

5. **Non-Applicable New Source Performance Standards (NSPS):**

40 CFR Part 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:

No storage tanks at this facility are subject to this standard due to the age of the tanks, age of any modifications or sizes.

6. **Applicable NESHAP:**

40 CFR Part 63 Subpart BBBBBB, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities:

The NESHAP regulation located at 40 CFR 63 Subpart BBBBBB is applicable to area source bulk terminals. The Coraopolis Terminal is an area source for HAPs; therefore, this regulation is applicable as an existing affected source. This regulation applies to the gasoline storage tanks, gasoline loading racks, vapor collection-equipped gasoline cargo tanks, and equipment components in vapor or liquid gasoline service, including each valve, pump, pressure relief device, sampling connection system, open-ended valve or line, and flange or other connector in the gasoline liquid transfer and vapor collection systems. Air Pollution Control Act Compliance Review Form was received by the Department on December 20, 2022. See Operating Permit #0041-OP25 for specific regulatory provisions.

7. **Emission Inventory:**

This facility is required to provide annual Emission Inventory reports per §2108.01.e of Article XXI because this facility has the potential to emit more than 25 tpy of VOC.

8. **Risk Management Plan; CAA Section 112(r):**

The facility is not required to have a risk management plan at this time because none of the regulated chemicals exceed the thresholds in the regulation.

9. **Greenhouse Gas Reporting (40 CFR Part 98):**

There are presently no Title V applicable requirements for greenhouse gases. Should the facility exceed 25,000 metric tons of CO_2e in any 12-month period, the facility would have to submit reports in accordance with 40 CFR Part 98.

10. **Compliance Assurance Monitoring (40 CFR Part 64):**
The Compliance Assurance Monitoring (CAM) rule found in 40 CFR 64 is applicable to this facility. CAM applies to VOC emissions from the two (2) loading racks used to load gasoline and/or petroleum distillates into tanker trucks due to the presence of a two (2) activated carbon adsorption/absorption vapor recovery units (VRUs). A CAM plan was submitted on April 11, 2025 and includes the following monitoring requirements: measurement of vacuum pressure and temperature of each carbon bed; measurement of each absorber's operating pressure; carbon testing for butane working capacity and dust content; and regular inspections of each VRU. All monitoring conditions have been included in the Title V Operating Permit.

EMISSIONS SUMMARY:

Emissions Summary for Coraopolis Terminals facility

Pollutant	Total (tpy*)
Volatile Organic Compounds (VOC)	**110.09**
Hazardous Air Pollutants (HAP)	**5.84**

* A year is defined as any consecutive 12-month period.

RECOMMENDATION:

All applicable Federal, State, and County regulations have been addressed in the permit application. The Title V Operating Permit for the Coraopolis Terminals facility should be approved with the emission limitations, terms and conditions in Permit #0041-OP25.