

May 7, 2021

Permit Intake Clerk  
c/o Yesenia Camarena  
Alaska Department of Environmental Conservation  
Air Permits Program  
555 Cordova Street  
Anchorage, Alaska 99501

Submitted via email to: [Yesenia.camarena@alaska.gov](mailto:Yesenia.camarena@alaska.gov)

Hard copy to follow via USPS certified mail

Subject: Owner Requested Limit Application for Crowley Fuels Bethel Bulk Fuel Facility

Dear Permit Application Reviewers:

Crowley Fuels LLC (Crowley Fuels) is submitting the attached application for an Owner Requested Limit (ORL) under authority of 18 AAC 50.225 for our Bethel Bulk Fuel Facility.

Our request for an ORL stems from a change in the company's business plan to increase the volume of gasoline sales to respond to anticipated market demand. Currently the Bethel facility daily sales of gasoline are restricted by a Alaska Department of Environmental Conservation (Department) issued Pre-Approved Emission Limit (PAEL).

As part of our business plan for Bethel, we have commenced a retrofit project to install internal floating roofs on each of our gasoline storage tanks and install a vapor combustion unit for the tank truck loading rack. The upgrade projects are underway to meet the requirements of being classified as a Bulk Gasoline Terminal under the federal rules in 40 CFR 63, Subpart BBBB. The on-site retrofit efforts will commence in June with anticipated completion by late August this year.

To support our project schedule, we are requesting the Department to set a schedule of review for the ORL application that will result in issuance by August 31. Please let us know how we may assist the Department's efforts to support a late August issuance of the ORL. In the event the late August ORL issuance schedule is not achievable, we request the Department take an independent action to rescind the existing PAEL #AQ0852PL101P no later than August 31 so we may commence throughput operations as allowed under a Terminal classification.

To help support a timely review of the application, we have taken the liberty of presenting an initial draft of an ORL using the format of other available ORL documents from the Department's web site as a model.

For processing the ORL application, I am enclosing a check for the one-time administrative fee of \$2,168 set out in 18 AAC 50.400(f). I understand that Crowley Fuels will also be subject to an annual compliance review fee of \$319 for the Bethel Bulk Fuel Terminal after the ORL is issued.

We very much appreciate the Department's attention to this application as soon as reasonably possible. Carrie Godden, our Vice President of Safety, Facilities & Compliance, is most familiar with the application. She would be pleased to answer any questions or otherwise assist in expediting the permitting process. Please feel free to contact her at 907-354-3972.

Thank you for your assistance.

Sincerely,



Richard W. Meidel, Jr.  
Vice President & General Manager

Enclosures:

- 1) Application for Owner Requested Limit with attachments
- 2) Check made payable to State of Alaska in amount of \$2,168

Cc:

Patrick Dunn w/ enclosure 1, Alaska Department of Environmental Conservation via email:  
[Patrick.dunn@alaska.gov](mailto:Patrick.dunn@alaska.gov)

Carrie Godden, Crowley Fuels Vice President – Safety, Facilities & Compliance

Shannon Oelkers, Integrity Environmental Consulting, LLC

Tom Chapple, HMH Consulting, LLC

# Application for an Owner Requested Limit

*for*

## Crowley Fuels LLC Bethel Bulk Fuel Terminal

*Submitted To:*

Alaska Department of Environmental Conservation  
Division of Air Quality, Air Permits Program

*Prepared By:*



200 West 34<sup>th</sup> Ave, PMB 253, Anchorage, AK 99503

[www.hmhconsulting.org](http://www.hmhconsulting.org)

*And*

**Integrity Environmental, LLC**

12110 Business Blvd., Ste. 6, PMB #434, Eagle River, AK 99577

[www.integrity-environmental.com](http://www.integrity-environmental.com)

[info@integrity-environmental.com](mailto:info@integrity-environmental.com)

May 7, 2021

## 1.0 Introduction

Crowley Fuels LLC (hereafter Crowley Fuels) owns and operates the Bethel Bulk Fuel Facility, which is located at the south end of the town of Bethel adjacent to the Kuskokwim River, as shown in the aerial view in Figure 1. The facility is comprised of a North Tank Farm and a South Tank Farm (Figure 2) that are used to store and distribute gasoline<sup>1</sup> and distillate fuel oil<sup>2</sup> products. Fuel is loaded onto tank trucks from two tank truck loading racks, one each at the North Tank Farm and South Tank Farm. Fuel is also loaded onto barges from a marine header for fuel delivery to upriver communities. Associated tug vessels are also fueled at the marine header site. Furthermore, there are three small diesel-fired boilers at the facility to provide office and shop heat.

Crowley Fuels is submitting this application for an Owner Requested Limit (ORL) under authority of 18 AAC 50.225 because the company desires to increase its gasoline sales volumes at the Bethel Bulk Fuel Facility to address the anticipated market demand for gasoline products in the region, yet while still limiting its operations sufficiently to avoid the requirement to obtain a Title V air operating permit under state or federal law.

Coincident with this application for an ORL, Crowley Fuels is requesting that the Pre-Approved Emission Limit (PAEL) AQ0852PL101P be rescinded as an independent action no later than August 31, 2021 – the anticipated date for start-up of the upgraded facility.

The Bethel facility is currently limited to 19,900 gallons of gasoline products per day as set out in the Alaska Department of Environmental Conservation (Department) issued PAEL. Increasing the daily gasoline throughput volume above 20,000 gallons per day will change its classification under federal rules from a Gasoline Bulk Plant to a Gasoline Bulk Terminal. Crowley Fuels desires to change its plan of operations, recognizing the requirements of the federal rules<sup>3</sup> to install a vapor control system at the North Tank Farm tank truck loading rack and to install internal floating roofs in its gasoline storage tanks. Because these facility upgrades will be highly effective at controlling air emissions, facility-wide gasoline volumes can substantially increase while still reducing emissions of volatile organic compounds (VOCs) to values that are below those estimated for calendar 2020 operations. \

While this ORL permit application, if approved, allows for significant growth in Crowley Fuels' Bethel operations, the facility wide emissions of VOCs will be less than 13 tons per year which is far below the 100 ton per year (tpy) trigger value that would require Crowley Fuels to obtain a Title V air operating permit.

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<sup>1</sup> Gasoline products at the Bethel Bulk Fuel Facility include unleaded gasoline and aviation gasoline.

<sup>2</sup> Distillate fuel oil products at the Bethel Bulk Fuel Facility include Ultra Low Sulfur Diesel (ULSD) No. 1 and No. 2, as well as Jet-A (kerosene).

<sup>3</sup> 40 CFR 60, Subpart XX, 40 CFR 63, Subpart BBBB, and 40 CFR 60, Subpart Kb.



**Figure 1: Aerial View of Bethel, Alaska**



**Figure 2: Aerial Site Photograph of Bethel Bulk Fuel Facility**

## **2.0 ORL Application Requirements**

Crowley Fuels is providing information in the paragraphs below to fulfill the applicable requirements identified in 18 AAC 50.225(b)(1)-(6), (8) and (9) for obtaining an ORL authorization.

### **2.1 Stationary Source Identification**

A completed stationary source identification form is provided as Attachment 1 in response to 18 AAC 50.225(b)(1).

### **2.2 Emission Unit Inventory**

As required under 18 AAC 50.225(b)(2), an emission unit inventory is provided in Table 1 below.

As noted in Table 1, the EU ID 4 fuel storage tank will be switched to gasoline service for future operations, while the EU ID 16 fuel storage tank will be switched to diesel service. The installation of internal floating roofs on the gasoline storage tanks (EU IDs 1, 2 and 4) is planned to commence in June 2021.

Several of the fuel storage tanks are empty and on standby status, including EU IDs 6-9, 17, 19 and 20.

Currently, both diesel and gasoline are loaded at both the South and North tank truck loading racks. In future years, diesel will continue to be loaded at both racks, but only the North tank truck loading rack will be used for gasoline loading. The North tank truck loading rack will be equipped with a vapor combustion unit (VCU) which is planned to commence operation by late August 2021.

### **2.3 Calculation of Emissions**

18 AAC 50.225(b)(3) requests calculations of the facility's actual emissions and potential to emit air pollutants under the proposed ORL. Table 2 below presents a summary of actual and potential emissions for all emission units at the facility. Detailed emissions calculations are provided as Attachment 2, while submitted separately. The Environmental Protection Agency (EPA) Tanks Model 4.0 was used to estimate storage tank VOC emissions for actual and potential throughput volumes of gasoline and diesel fuel products. The Tanks Model output files are provided as Attachment 3 (submitted separately). The calculated actual emissions are based on the Bethel Bulk Fuel Facility's calendar year 2020 operations, for which the total gasoline throughput was 3,108,004 gallons and the total diesel throughput was 9,981,273 gallons. To estimate future operations for the calculated potential to emit, roughly four times the calendar year 2020 fuel volume throughput levels are assumed (12,000,000 gallons of gasoline annually). The potential to emit calculations take into account the planned installation of the internal floating roofs on the gasoline storage tanks and the VCU on the North tank truck loading rack. The manufacturer

specifications and guaranteed emission rates for the proposed VCU are provided in Attachment 4.

Gasoline storage and loading cause the majority of VOC emissions at the facility and are the determining factor in whether the facility remains below the 100 tpy Title V permitting threshold. VOC emissions from diesel storage and loading have also been determined, yet diesel fuel operations account for a relatively small portion of the facility's overall air emissions.

Operation of the VCU and three diesel-fired boilers will produce minor amounts of VOCs and other traditional pollutants including carbon monoxide, nitrogen oxides, particulate matter, and sulfur dioxide, but in quantities that are far less than the triggering amounts for a minor permit under 18 AAC 50.502(c)(1). Furthermore, the VCU design information was examined with respect to 18 AAC 50.502(b)(4), to determine if a minor source permit would be required for the VCU in the event the maximum design capacity of the unit is designed to handle more than 1,000 pounds per hour of gasoline vapors from the North tank truck loading rack. The maximum design capacity was determined to be 818 lbs. per hour – see Sheet #10 of Attachment 2 for additional information.

In summary, as shown in the emissions summary in Table 2, the assumed increase in gasoline and diesel throughput in the potential to emit calculation leads to slight increases in carbon monoxide, nitrogen oxides, particulate matter, and sulfur dioxide. In contrast, VOC emissions decrease considerably in the potential to emit scenario, due to the installation of the internal floating roofs and VCU. The facility-wide emissions of all pollutants will be less than the threshold values that would require Crowley Fuels to obtain a minor source permit or a Title V air operating permit.

## **2.4 Proposed Limits**

In response to 18 AAC 50.225(b)(4), Crowley Fuels is requesting the following operating restrictions be incorporated into the Department issued ORL.

1. Limit annual aggregate VOC emissions from EU IDs 1, 2, and 4 to no more than 3.8 tons by limiting the facility throughput of gasoline products to 12,000,000 gallons of fuel combined for any consecutive 12-month period.
2. Install, maintain and operate an internal floating roof for each of EU IDs 1, 2, and 4.
3. Limit annual aggregate VOC emissions from EUs 21 and 24 to no more than 7.9 tons by 1) installing, maintaining, and operating a VCU attached to EU 21 with a 95 percent VOC control efficiency and 2) employ submerged loading practices when loading gasoline from EU 24 onto marine cargo tanks and vessels.

These requested operating restrictions are incorporated into a suggested ORL draft for Department consideration as Attachment 5 to this application.

## **2.5 Monitoring and Recordkeeping Requirements**

In response to the requirements of 18 AAC 50.225(b)(5), Crowley Fuels proposes to monitor, record and report the daily, monthly, and 12-month gasoline throughputs for storage tank EU IDs

1, 2, and 4, both individually and combined. If the total gasoline throughput exceeds 12,000,000 gallons for EU IDs 1, 2, and 4 for any consecutive 12-month period, Crowley Fuels shall report as excess emissions and a permit deviation. Likewise, if the VCU attached to the North tank truck loading rack (EU ID 21) is non-operational, or if submerged loading practices are not used when loading gasoline from the marine header into barges (EU ID 24), Crowley Fuels shall report as excess emissions and a permit deviation.

As noted above, Attachment 5 incorporates these monitoring, recordkeeping, and reporting requirements into a suggested draft of the ORL.

## **2.6 Statement of Avoided Requirement**

Concerning 18 AAC 40.225(b)(6), Crowley Fuels seeks to avoid the requirement to obtain a Title V air operating permit by limiting its operations, as explained in the introduction to this application and also in the Statement of Avoided Requirements in Attachment 5.

## **2.7 Statement of Ability to Comply**

With regard to 18 AAC 50.225(b)(8), Crowley Fuels hereby affirms that it is willing and capable of complying with the requested operational restrictions and performing the associate monitoring, record keeping and reporting to verify compliance with the requested operational restrictions of the ORL.

## **2.8 Certification Statement**

The certification of reasonable inquiry, truth and accuracy for the application as required by 18 AAC 50.225(b)(9) is provided on the completed Stationary Source ID form found in Attachment 1.

The Responsible Official Add/Change Form is provided as Attachment 6.

Table 1: Crowley Fuels Bethel Facility Emission Unit Inventory

EU ID	Description	Dimensions (diam. x height in ft.)	Product Stored, Loaded or Combusted	Max Capacity/Rating	Year Constructed/Modified
1	Fuel Storage Tank #1	60 x 40	Gasoline	20,153 bbl	2003
2	Fuel Storage Tank #2	60 x 40	Gasoline	20,100 bbl	2003
3	Fuel Storage Tank #3	73.5 x 40	Diesel	30,203 bbl	2003
4	Fuel Storage Tank #4	73.5 x 40	Diesel pre-2021 / Gasoline 2021	30,354 bbl	2003
5	Fuel Storage Tank #5	73.5 x 40	Diesel	30,301 bbl	2003
6	Fuel Storage Tank #22-407	50 x 30	Standby Status	10,459 bbl	1948
7	Fuel Storage Tank #22-408	55 x 36.33	Standby Status	15,363 bbl	1953
8	Fuel Storage Tank #22-409	40 x 36	Standby Status	8,095 bbl	1958
9	Fuel Storage Tank #22-410	44 x 36	Standby Status	9,701 bbl	1958
10	Fuel Storage Tank #22-411	34 x 36	Diesel	5,783 bbl	1969
11	Fuel Storage Tank #22-412	65 x 36	Diesel	21,234 bbl	1970 / 1993
12	Fuel Storage Tank #22-413	41 x 32.17	Diesel	7,582 bbl	1972 / 1996
13	Fuel Storage Tank #22-414	90 x 36	Diesel	41,342 bbl	1972

EU ID	Description	Dimensions (diam. x height in ft.)	Product Stored, Loaded or Combusted	Max Capacity/Rating	Year Constructed/Modified
14	Fuel Storage Tank #22-415	60 x 40	Diesel	20,345 bbl	1976 / 1996
15	Fuel Storage Tank #22-416	73 x 48	Diesel	35,854 bbl	1978
16	Fuel Storage Tank #22-417	57 x 48	Gasoline pre-2021 / Diesel 2021	22,003 bbl	1967 / 1993
17	Fuel Storage Tank #22-418	48 x 48	Standby Status	15,519 bbl	1967 / 1996
18	Fuel Storage Tank #22-419	48 x 48	Diesel	15,288 bbl	1967 / 1996
19	Fuel Storage Tank #22-420	40 x 36	Standby Status Emergency Use Only	8,057 bbl	1950's (estimate)
20	Fuel Storage Tank #22-421	40 x 36	Standby Status	8,057 bbl	1950's (estimate)
21	North Tank Truck Loading Rack	N/A	Gasoline	N/A	2003 / VCU equipped 2021
22	North Tank Truck Loading Rack	N/A	Diesel	N/A	2003
23	South Tank Truck Loading Rack	N/A	Diesel	N/A	Pre-1980 / 2011
24	Marine Barge Loading Dock Operations	N/A	Gasoline	N/A	2004

EU ID	Description	Dimensions (diam. x height in ft.)	Product Stored, Loaded or Combusted	Max Capacity/Rating	Year Constructed/Modified
25	Marine Barge Loading Dock Operations <sup>1</sup>	N/A	Diesel	N/A	2004
26	Shop Boiler (Peerless LC-05)	N/A	Diesel	0.615 MMBtu	2012
27	Office Boiler (2000 EK-1)	N/A	Diesel	0.12 MMBtu	2000
28	Weld Shop Boiler (Modine POR185B)	N/A	Diesel	0.185 MMBtu	2000 (estimate)

1. Also includes filling tanks for propulsion of tug vessels.

Table 2: Emissions Summary

	Fuel Throughput, Facility Total (gallons)		Pollutant Emissions, Facility Total <sup>1</sup> (tpy)				
	Gasoline	Diesel	VOC	CO	NOx	PM	SO <sub>2</sub>
<b>Actual Operation (CY2020)</b>	3,108,004	9,981,273	32.34	0.19	0.76	0.12	0.80
<b>Future Operation (Under ORL)</b>	12,000,000	40,000,000	12.45	0.55	0.90	3.60	2.51

1. The totals in the table reflect all emission units at the facility: the gasoline and diesel fuel storage tanks, the North and South tank truck loading racks, the marine barge loading dock operations, and the three small diesel-fired boilers.

# Attachment 1- ADEC Stationary Source ID Form

Crowley Fuels LLC Bethel Bulk Fuel Terminal

ORL Application – April 2021

## OWNER REQUESTED LIMIT IDENTIFICATION FORM

<b>Alaska Department of Environmental Conservation Owner Requested Limit Application</b>	<b>ADEC USE ONLY</b> Receiving Date: ADEC Control #:  ORL : _____
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## STATIONARY SOURCE IDENTIFICATION FORM

### Section 1 Stationary Source Information

Stationary Source Name: Crowley Fuels LLC Bethel Bulk Fuel Terminal			
Project Name (if different):		Stationary Source Contact: Carrie Godden	
Source Physical Address: 380 Standard Oil Rd., Bethel, AK 99559		City: Anchorage	State: AK
		Zip: 99518	
		Telephone: 907-777-5461	
		E-Mail Address: Carrie.Godden@crowley.com	
UTM Coordinates or Latitude/Longitude:		Northing:	Zone:
		Latitude: 60°47.1' North	Longitude: 161°40.7' West

### Section 2 Legal Owner

Name: Crowley Fuels LLC		
Mailing Address: 201 Arctic Slope Avenue		
City: Anchorage	State: AK	Zip: 99518
Telephone #: 907-777-5505		
E-Mail Address:		

### Section 3 Operator (if different from owner)

Name:		
Mailing Address:		
City:	State:	Zip:
Telephone #:		
E-Mail Address:		

### Section 4 Designated Agent (for service of process)

Name: Richard Meidel		
Mailing Address: 201 Arctic Slope Avenue		
City: Anchorage	State: AK	Zip: 99518
Physical Address: same		
City:	State:	Zip:
Telephone #: 907-777-5505		
E-Mail Address: Rick.Meidel@crowley.com		

### Section 5 Billing Contact Person (if different from owner)

Name: Carol Jackson		
Mailing Address: 201 Arctic Slope Avenue		
City: Anchorage	State: AK	Zip: 99518
Telephone #: 907-777-5526		
E-Mail Address: Carol.Jackson@crowley.com		

### Section 6 Application Contact

Name: Carrie Godden		
Mailing Address: 201 Arctic Slope Avenue, Anchorage, AK 99815		
City: Anchorage	State: AK	Zip: 99815
Telephone: 907-777-5461		
E-Mail Address: Carrie.Godden@crowley.com		

# Attachment 1- ADEC Stationary Source ID Form

Crowley Fuels LLC Bethel Bulk Fuel Terminal

ORL Application – April 2021

## • Section 7 Certification

This certification applies to the Air Quality Control Owner Requested Limit Application for the

Crowley Fuels LLC Bethel Bulk Fuel Terminal

submitted to the department on: 05/07/2021.

(Stationary Source Name)

### Type of Application

- Initial Application  
 Change to Initial Application

The application is **NOT** complete unless the certification of truth, accuracy, and completeness on this form bears the **signature of a responsible official** of the firm making the application. (18 AAC 50.205)

### CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS

"Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete."

Signature: 	Date: 05/07/2021
Printed Name: Richard W. Meidel	Title: Vice President/ General Manager

## Section 13 Attachments

Attachments Included. List attachments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## **Attachment 2 - Emissions Calculations**

**Crowley Fuels LLC Bethel Bulk Fuel Terminal**

**ORL Application –May 2021**

Excel file titled: Emission Calculations Crowley Fuels Bethel\_HMH  
final.xlsx to be submitted separately via electronic delivery

## **Attachment 3 – EPA Tanks Model 4.0 Output Files**

**Crowley Fuels LLC Bethel Bulk Fuel Terminal**

**ORL Application – April 2021**

File titled: Tanks Model Output Report Crowley Fuels Bethel.pdf to be submitted separately via electronic delivery

# Attachment 4 – Manufacturer Data for Vapor Combustion Unit

Crowley Fuels LLC Bethel Bulk Fuel Terminal

ORL Application – April 2021

Crowley Fuels LLC proposes to install a John Zink Hamworthy Combustion model: ZT-2XX-0530-1/01/06 vapor combustion unit at the North tank truck loading rack at its Bethel Bulk Fuel Facility.

An email of March 18, 2021 from a John Zink representative to Crowley Fuels provides the emission performance specifications for the unit. Selected engineering drawings of the unit are also provided below.

**From:** Rohr, Emily M <[Emily.Rohr@johnzink.com](mailto:Emily.Rohr@johnzink.com)>  
**Sent:** Thursday, March 18, 2021 8:37 AM  
**To:** Rigby, Jessica <[Jess.Rigby@crowley.com](mailto:Jess.Rigby@crowley.com)>  
**Cc:** Perez, Alfonso <[Alfonso.Perez@johnzink.com](mailto:Alfonso.Perez@johnzink.com)>  
**Subject:** RE: Crowley Fuels: Performance Specification Document

Jessica,

Please see the information below, hopefully this covers everything.

## VCU Stack Information

- Diameter: 5' O.D.
  - Stack Height: 25' tall
  - Exit Velocity: 25 ft/sec
  - Operating Temperature: Minimum operating temp of 500 F (to be confirmed at source test)
  - Maximum Inlet Flowrate: 800 gpm (or 107 scfm)
  - Maximum Inlet Concentration: 60% as propane
  - I have not assumed a pre-heat for the stack (typically we base that on the permit requirement) because that will cause the propane usage to go up. If a pre-heat is required, the estimate would be about 10 scfm of propane to meet 500 F or 98% DRE (to be confirmed at source test).
- NOTE: If the permit does require a preheat, please let us know. This will change the program in the VCU and we need to note it for the execution group.**

## Emission Information

- The guarantee for the VCU is 10 mg hydrocarbon (VOC) per liter product loaded but she references 35 mg/L below. We would not have changed anything on the VCU to meet either so I will let you decide how to proceed with that.
- 4 mg Nitrogen Oxides (NOx) per Liter Product Loaded
- 10 mg Carbon Monoxide (CO) per Liter Product Loaded
- There is so much particulate matter in industrial settings that have origins completely unrelated to combustion (particles pulled down the vapor pipe, dust sucked through the dampers, dust pulled in by the combustion air blower, insulation flaking off over time), that the particulate matter that is a product of combustion represents a very minute portion of the PM on the site, and is not a particularly illuminating criterion when it comes to flare performance. It is important to note that our combustion is 100% smokeless so per AP42, chapter 13, the soot level would be represented as 0. When it has come to PM, there are only a few tests we have seen that have tried to measure it but the answers have varied considerably. I may be able to come up with a starting point but wanted to explain why it isn't necessarily a value for it.

I think that covers most of the questions, please let me know if you need anything else.

Thank you,

Emily Rohr | Applications Engineer | Vapor Control Systems  
John Zink Company LLC  
11920 East Apache | Tulsa, OK 74116  
T: +1 918.234.4752  
F: +1 918.234.1868  
E: [Emily.Rohr@johnzink.com](mailto:Emily.Rohr@johnzink.com)







# Attachment 5 – Suggested Draft of Owner Requested Limit

Crowley Fuels LLC Bethel Bulk Fuel Terminal

ORL Application – May 2021

## DEPARTMENT OF ENVIRONMENTAL CONSERVATION OWNER REQUESTED LIMIT

**Owner Requested Limit:** AQ \_\_\_\_\_ **DRAFT**

**Owner/Operator:** Crowley Fuels LLC

**Stationary Source:** Bethel Bulk Fuel Terminal

**Location:** **Latitude:** 60° 47.1' N **Longitude:** 161° 47.7' W

**Project:** Revised Plan of Operations

**Permit Contact:** Carrie Godden  
[Carrie.Godden@crowley.com](mailto:Carrie.Godden@crowley.com)  
907-777-5461

The above-named owner/operator has submitted a complete request for an owner requested limit (ORL) under 18 AAC 50.225(b) for the Crowley Fuels LLC's Bethel Bulk Fuel Terminal. The Alaska Department of Environmental Conservation (Department) approves the ORL to restrict the stationary source's potential to emit (PTE). The ORL allows Crowley Fuels LLC to avoid the requirement for a Title V operating permit. The Department certifies that the ORL is effective as of the date noted below.

In accordance with 18 AAC 50.225(f), the owner/operator has agreed to the conditions listed in this ORL.

The owner/operator may revise the terms and conditions of this approval under 18 AAC 50.225(h)(1) by submitting a request under 18 AAC 50.225(b). The owner/operator may request the Department to revoke the limit in accordance with 18 AAC 50.225(h)(2). This limit remains in effect until the Department approves a new limit or revokes it.

I understand and agree to the terms and conditions of this approval.

\_\_\_\_\_  
Owner or Operator

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title

Department approval:

\_\_\_\_\_  
James R. Plosay, Program Manager  
Air Permit Program

\_\_\_\_\_  
Owner Requested Limit Effective Date

## Attachment 5 – Suggested Draft of Owner Requested Limit

Crowley Fuels LLC Bethel Bulk Fuel Terminal

ORL Application – May 2021

### Conditions:

1. **Owner Requested Limit to keep volatile organic compounds from gasoline storage tanks to no more than 3.8 tons per year (tpy).** The owner/operator shall limit gasoline throughput for emission units (EUs) 1, 2, and 4 listed in Table 1 to no more than 12,000,000 gallons of fuel combined for any consecutive 12-month period. Monitor, record, and report as follows:
  - 1.1. Install, maintain and operate an internal floating roof for each EU listed in Condition 1.
  - 1.2. Record the amount of gasoline transferred from the storage tanks each day.
  - 1.3. Calculate and record, for each EU listed in Condition 1, the monthly totals calculated in Condition 1.2 within fifteen days after the end of each month.
  - 1.4. Calculate and record the combined monthly gasoline throughput from the EUs listed in Condition 1 within fifteen days after the end of each month.
  - 1.5. Calculate and record the combined 12-month gasoline throughput from the EUs listed in Condition 1 by summing the last 12 consecutive records obtained in accordance with Condition 1.4, within fifteen days after the end of each month.
  - 1.6. Report in the operating report as described in Condition 4 the records obtained in accordance with Condition 1.5.
  - 1.7. If the total gasoline throughput exceeds the limit in Condition 1, report as excess emissions and permit deviation as specified in Condition 5.
  
2. **Owner Requested Limit to keep VOC emissions from gasoline loading operations to no more than 7.9 tons per year (tpy).** The owner/operator shall limit VOC emissions from EUs 21 and 24 listed in Table 1 as follows:
  - 2.1. Install, maintain, and operate a vapor combustion unit attached to EU 21 with a 95 percent VOC control efficiency.
  - 2.2. Employ submerged loading practices when loading gasoline from EU 24 onto marine cargo tanks and vessels.
  - 2.3. Comply with Condition 1.
  - 2.4. If the vapor combustion unit attached to EU 21 does not meet the requirements of Condition 2.1, or is non-operational, report as excess emissions and permit deviation as specified in Condition 5.

## Attachment 5 – Suggested Draft of Owner Requested Limit

Crowley Fuels LLC Bethel Bulk Fuel Terminal

ORL Application – May 2021

3. **Recordkeeping Requirements.** Unless otherwise specified in this authorization, keep all records required by this ORL for at least five years from the date of collection.
4. **Annual Operating Reports.** Submit one certified copy, of an annual operating report for the stationary source to the Department, Air Permits Program, 610 University Avenue, Fairbanks, Alaska 99709-3643 by February 1 for the preceding calendar year. Certify the report as specified in 18 AAC 50.205 by having the responsible official sign after the following statement, “Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.” Attach copies of all excess emission and deviation forms submitted to the Department during the reporting period pursuant to Condition 5.
5. **Excess Emissions and Deviation Reports.** Report all emissions or operations that exceed or deviate from the requirements of this ORL limit as follows:
  - 5.1. In accordance with 18 AAC 50.240(c), report to the Department as soon as possible emissions that present a potential threat to human health or safety and excess emissions believed to be unavoidable.
  - 5.2. Report all other excess emissions and deviations:
    - a) within 30 days of the end of the month in which the emissions or deviation occurs, except as provided in Condition 5.2.b; and
    - b) if a continuous or recurring excess emission is not corrected within 48 hours of discovery, report within 72 hours of discovery unless the Department provides written permission to report under Condition 5.2.a.
  - 5.3. When reporting excess emissions and deviations, use either the Department’s notification form located in Attachment A of this ORL and online at <http://www.dec.state.ak.us/air/ap/docs/eeform.pdf> or provide all information called for by that form.
  - 5.4. If requested by the Department, provide a more detailed written report as requested to follow up an excess emissions report.

### Statement of Avoided Requirement:

Crowley Fuels LLC desires to increase its gasoline sales volumes at the Bethel Bulk Fuel Facility to address the anticipated market demand for gasoline products in the region, yet while still limiting its operations sufficiently to avoid the requirement to obtain a Title V air operating permit under state or federal law.

Crowley Fuels LLC is changing its plan of operations and recognizing the requirements of the federal rules to install a vapor control system at the tank truck loading rack and to install internal floating roofs in its gasoline storage tanks. Because the facility upgrades will be highly effective at controlling air emissions, facility-wide gasoline volumes can substantially increase while still

## Attachment 5 – Suggested Draft of Owner Requested Limit

Crowley Fuels LLC Bethel Bulk Fuel Terminal

ORL Application – May 2021

reducing emissions of volatile organic compounds to values below those estimated for calendar 2020 operations.

The owner requested limits retain facility wide emissions of volatile organic compounds to less than 13 tons per year which is far below the 100 ton per year trigger to obtain a Title V air operating permit.

**Table 31: Crowley Fuels Bethel Bulk Fuel Terminal Emission Unit Inventory Subject to Limits**

EU ID	Unit Description	Capacity (bbls)	Year Installed or Constructed	Product Stored or Loaded
1	Storage Tank #1	20,153	2003	Gasoline
2	Storage Tank #2	20,100	2003	Gasoline
4	Storage Tank #4	30,354	2003	Gasoline
21	North Tank Truck Loading Rack w/ VCU system	N/A	2003	Gasoline
24	Marine Barge Loading Dock Operations	N/A	2004	Gasoline

# Attachment 6 – Responsible Official Add/Change Form

Crowley Fuels LLC Bethel Bulk Fuel Terminal

ORL Application – April 2021



## Responsible Official Add/Change Form Instructions

Please use One Form per each Stationary Source

Version 4

Permittee: Crowley Fuels L.L.C.

Stationary Source Name: Bethel Bulk Fuel Terminal

Permit #(s): TBD

### **DEFINITION:** 18 AAC 50.990 (93) "Responsible Official" means

(A) For a corporation: a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation, or a duly authorized representative of that person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under AS 46.14 or this chapter, and

(i) the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 Million in second quarter 1980 dollars; or

(ii) the delegation of authority to the representative is approved in advance by the Department;

(B) For a partnership or sole proprietorship: a general partner or the proprietor, respectively; and

(C) For a public agency: a principal executive officer or ranking elected official; for the purposes of this chapter, a principal executive officer of a federal agency includes the chief executive officer with responsibility for the overall operation of a principal geographic unit in this state.

**Please Note:** The shaded grey area defines a duly authorized representative who is not a corporate officer and who would then qualify either under (A)(i) or (A)(ii) not (A). These representatives cannot certify their own nomination as a responsible official.

When filling out the RO form on the next page, please select only one Responsible Official (RO) definition below which applies to your Stationary Source. For each individual, attach supporting documentation explaining HOW the individual meets the definition of an RO under the regulatory part selected:

**Under (A):** Acknowledgement of Change in RO for Corporate officials i.e. President, Corporate Secretary etc. or for other persons who perform similar policy or decision making functions such as a Director, Chief Operating Officer or Chief Executive Officer.

**Under (A)(i):** Delegation Acknowledgement of RO change for a duly authorized representative responsible for one or more facilities of the size as described in (A)(i). i.e approx. conversion \$25 M 1980 dollars – 74.8M 2013 dollars.

**Under (A)(ii):** Department Approval for Change or Delegation of RO under (A)(ii) for smaller corporate facilities than those listed in (A)(i) or persons whose role within the facility meets Department approval.

**Under (B):** Acknowledgement of Change in RO for a Partnership (eg LLC) or Sole Ownership. ( No delegation allowed )

**Under (C):** Acknowledgement of Change in RO for a Public Agency. ( No delegation allowed )

# Attachment 6 – Responsible Official Add/Change Form

Crowley Fuels LLC Bethel Bulk Fuel Terminal

ORL Application – April 2021



## Responsible Official Add/Change Form

Please use One Form per each Stationary Source

Version 4

Permittee: Crowley Fuels L.L.C.

Stationary Source Name: Bethel Bulk Fuel Terminal

Permit #: TBD

### REMOVE THE FOLLOWING RESPONSIBLE OFFICIAL(S)

Name: _____	Title: _____
-----	
Name: _____	Title: _____

### ADD NEW RESPONSIBLE OFFICIAL(S) Please check one box only for each nominated RO:

This RO meets the definition under (A) <input checked="" type="checkbox"/> / (A)(i) <input type="checkbox"/> / (A)(ii) <input type="checkbox"/> (B) <input type="checkbox"/> (C) <input type="checkbox"/>	
Name: <u>Richard Meidel Jr.</u>	Title: <u>Vice President</u>
Address: <u>201 Arctic Slope Ave., Anchorage, AK 99518</u>	
Phone: <u>907-777-5505</u>	E-mail: <u>Rick.meidel@crowley.com</u>
-----	
This RO meets the definition under (A) <input type="checkbox"/> / (A)(i) <input type="checkbox"/> / (A)(ii) <input type="checkbox"/> (B) <input type="checkbox"/> (C) <input type="checkbox"/>	
Name: _____	Title: _____
Address: _____	
Phone: _____	E-mail: _____
-----	
This RO meets the definition under (A) <input type="checkbox"/> / (A)(i) <input type="checkbox"/> / (A)(ii) <input type="checkbox"/> (B) <input type="checkbox"/> (C) <input type="checkbox"/>	
Name: _____	Title: _____
Address: _____	
Phone: _____	E-mail: _____

Responsible Official Certification 18 AAC 50.205. Certification. (a) Any permit application, report, affirmation, or compliance certification required by the Department under a permit program established under AS 46.14 or this chapter must include the signature of a Responsible Official for the permitted stationary source following the statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, and complete."

Signature: *Richard Meidel Jr.* Title: Vice President

Print Name: Richard Meidel Jr. Date: 05/07/2021 Phone: 907-205-2076  
or  
907-777-5505

Please Note: A Nominee under (A)(i) or (A)(ii) cannot certify their own nomination.

<b>Department use only</b>		
ADEC Approval/Acknowledgement Signature	Print Name	Date