

21 November 2005

Chandra Sripadam  
TE Products Pipeline Company, LP  
P.O. Box 2521  
Houston, TX  
77252-2521

Dear Ms. Sripadam:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your request for the installation of air pollution control equipment at your 25 Fields Point Drive, Providence facility.

Enclosed is a minor source permit issued pursuant to our review of your request (Approval No. 1869).

I can be reached at 401-222-2808, extension 7011 if you have any questions.

Very truly yours,

Douglas L. McVay,  
Associate Supervising Engineer  
Office of Air Resources

cc: Providence Building Official

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR RESOURCES**

**MINOR SOURCE PERMIT**

*TE Products Pipeline Company, LP*

**APPROVAL NO. 1869**

**Pursuant to the provisions of Air Pollution Control Regulation No. 9, this minor source permit is issued to:**

*TE Products Pipeline Company, LP*

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**For the following:**

*Installation of a Flare King flare, Model No. FKAVP-H50-R5S-EPT to control air*

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*pollution emissions from the LPG storage tank during standing storage and loading sessions.*

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**Located at:** *25 Fields Point Drive, Providence*

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**This permit shall be effective from the date of its issuance and shall remain in effect until revoked by or surrendered to the Department. This permit does not relieve *TE Products Pipeline Company, LP* from compliance with applicable state and federal air pollution control rules and regulations. The design, construction and operation of this equipment shall be subject to the attached permit conditions and emission limitations.**

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**Stephen Majkut, Chief  
Office of Air Resources**

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**Date of issuance**

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR RESOURCES**

Permit Conditions and Emission Limitations

**TE Products Pipeline Company, LP**

**Approval No. 1869**

A. Operating Requirements

1. The maintenance flare, used to treat excess propane that may be generated during transfer of LPG from marine vessels into the storage tank or due to pressure changes in the storage tank, shall not treat more than 16,000,000 pounds of propane in any 12-month period.
2. The maintenance flare shall be operated with a pilot flame present at all times, except for periods of time when the unit is out of service for maintenance and/or repair.
3. The maintenance flare shall be operated with no visible emissions.
4. The maintenance flare shall be operated at all times when propane gas is being vented to it.

B. Monitoring

1. The presence of a flare flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame.
2. The maintenance flare shall be equipped with a flame failure detection device that will sense a flameout of the flare and will alert terminal personnel to the extinguished flare pilot.
3. The flare system shall be equipped with a pilot ignition source. When the flare is lit or relit, fuel must be provided to ensure that a flame is present so that untreated propane is not discharged to the atmosphere.
4. The owner/operator shall visually inspect the flare system to confirm that a flame is present upon start-up or re-lighting of each flare unit. The date and time of each observation shall be recorded.
4. The mass flow of propane to the maintenance flare shall be continuously measured and recorded.

C. Record Keeping and Reporting

1. The owner/operator shall, on a monthly basis, no later than 5 days after the first of the month, determine the mass flow of propane to the maintenance flare for the previous 12 months.
2. The owner/operator shall notify the Office of Air Resources in writing within 30 days whenever the mass flow of propane to the maintenance flare exceeds 16,000,000 pounds in any 12-month period.
3. The owner/operator shall notify the Office of Air Resources in writing of the date of actual start-up of the maintenance flare system no later than 15 days after such date.
4. The owner/operator shall notify the Office of Air Resources of any anticipated noncompliance with the terms of this permit or any other applicable air pollution control rules and regulations.
5. The owner/operator shall notify the Office of Air Resources immediately of any breakdown or malfunction of the maintenance flare. A written report of any breakdown or malfunction shall be submitted within five (5) days of the breakdown or malfunction. The following information shall be provided in each report:
  - a. The date the breakdown or malfunction occurred
  - b. The suspected reason for the malfunction
  - c. The corrective action taken
  - d. The time needed to make repairsA copy of each report shall be kept at the facility.
6. The owner/operator shall notify the Office of Air Resources in writing of any planned physical or operational change to any equipment that would:
  - a. Change the representation of the facility in the permit application.
  - b. Alter the applicability of any state or federal air pollution rules or regulations.
  - c. Result in the violation of any terms or conditions of the permit.

d. Qualify as a modification under APC Regulation No. 9.

Such notification shall include:

- Information describing the nature of the change.
- Information describing the effect of the change on the emission of any air contaminant.
- The scheduled completion date of the planned change.

Any change, which may result in an increased emission rate of any air contaminant, shall be subject to the approval of the Director.

7. All records required as a condition of this approval shall be maintained for a minimum of five years after the date of each record and shall be made available to representatives of the Office of Air Resources upon request.

D. Other Permit Conditions

1. To the extent consistent with the requirements of this permit and applicable federal and state laws, the facility shall be designed, constructed and operated in accordance with the representation of the facility in the permit application.
2. Employees of the Office of Air Resources and its authorized representatives shall be allowed to enter the facility at all times for the purpose of inspecting any air pollution source, investigating any condition it believes may be causing air pollution or examining any records required to be maintained by the Office of Air Resources.
3. At all times, including periods of startup, shutdown and malfunction, the owner/operator shall, to the extent practicable, maintain and operate the facility in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Office of Air Resources which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source.