



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

MAY 18 1995

4APT-AEB

Ms. Susan Jenkins
Air Protection Branch
Environmental Protection Division
Georgia Department of Natural Resources
4244 International Parkway
Suite 120
Atlanta, GA 30354

SUBJ: Source Definition for Colonial Terminals, Inc.
Savannah, Georgia

Dear Ms. Jenkins:

Your letter of April 4, 1995, to Brian Beals requested a determination of whether two facilities owned and operated by Colonial Terminals, Inc., located in Savannah, Georgia, should be considered one "source" as that term is applied under Title V of the Clean Air Act (Act) and its implementing regulations found at 40 CFR Part 70. Your letter enclosed supporting documentation submitted to you from Colonial Terminals. Specifically, the two facilities are separated--approximately one-half mile apart, have diesel fuel and water pipelines between them, and operate under SIC code 4226.

In the beginning portion of the "major source" definition, the Part 70 regulations state:

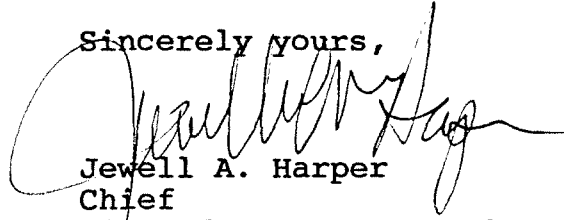
"Major source" means any stationary source (or any group of stationary sources that are located on one or more contiguous or adjacent properties, and are under common control of the same person (or persons under common control)) belonging to a single major industrial grouping and that are described in paragraphs (1), (2), or (3) of this definition. For the purposes of defining "major source", a stationary source or group of stationary sources shall be considered part of a single industrial grouping if all of the pollutant emitting activities at such source or group of sources on contiguous or adjacent properties belong to the same Major Group (i.e., all have the same two-digit code) as described in the Standard Industrial Classification Manual, 1987 (40 CFR 70.2).

The two Colonial Terminals facilities, without question, meet the criteria of common control and same industrial grouping. The remaining test is one of adjacency. Based on the information provided, we have concluded the two facilities are in close

proximity and should be treated as one source under Part 70. Additionally, we have noted that both facilities use the same access road, share diesel fuel and water pipelines, and interestingly, have their storage tank numbers listed sequentially on the air quality permits issued to both facilities.

Thank you for the opportunity to assist you and provide guidance. If you should have any questions about this letter, please contact Mr. Alan Drake of my staff at (404) 347-3555, voice mail extension 4151.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Jewell A. Harper". The signature is written in a cursive style and is positioned to the left of the typed name.

Jewell A. Harper
Chief
Air Enforcement Branch
Air, Pesticides and Toxics
Management Division