Florida Department of Environmental Protection

Northwest District
160 Governmental Center, Suite 308
Pensacola, Florida 32502-5794

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

April 29, 2010

BY ELECTRONIC MAIL
nbmagt@mchsi.com

Mr. Normond B. McAllister Jr., President
Gulf Terminal Corporation
Panama City Marine & Rail Terminal
122 South Center Avenue
Panama City, Florida 32401

Dear Mr. McAllister:

This is to acknowledge receipt of your request, DEP File No. 0050045-008-AC, for a time extension to the current expiration date of June 13, 2010 for air construction permit number 0050045-007-AC for the Gulf Terminal Corporation facility at 122 South Center Avenue in Panama City, Bay County.

Your request for an extension is incomplete. Please provide the information listed below. Evaluation of your request will be delayed until all information has been received.

1. Rule 62-4.080(3) of the Florida Administrative Code (F.A.C.) states that an extension of a construction permit may be granted if the applicant can demonstrate reasonable assurances that, upon completion, the extended permit will comply with the standards and conditions required by applicable regulations. Please provide an evaluation, signed and sealed by a Florida-registered Professional Engineer, attesting to this matter and making applicable recommendations for changes.

2. Operating permit 0050045-004-AO expired September 18, 2007 and cannot be renewed. Any activities previously covered by operating permit 0050045-004-AO that are not included in construction permit 0050045-007-AC are no longer authorized. Therefore, all of the activities you wish to perform in the future need to be included in construction permit 0050045-007-AC. If all of the future operating activities are not included in this construction permit, you will need to submit an application to modify the construction permit to include these activities. Please provide an evaluation, signed and sealed by a Florida-registered Professional Engineer, attesting to this matter and making applicable recommendations for changes that may be needed to the current construction permit. Provide a target

date for submittal of a revision to the construction permit if applicable. [Rules 62-4.030, 62-4.050(1) & (3) and 62-210.300(1)(a), F.A.C.]

3. The attached table was created based on the inventory contained in the current construction permit 0050045-007-AC and your e-mail to Deborah Moore dated March 8, 2010. Please verify the contents of the table, add any missing information and make corrections as necessary (for example, tank names, usage, capacity, etc.). In the space provided beside each operating tank name or activity, insert the word "Operating" and the date operation began under the construction permit. If the tank, etc., is under construction or still to be constructed, insert "TBC" in the space provided. In the rows provided at the bottom of the attached table, list any air emitting operating activities or construction not included in the construction permit and include the approximate date that operation began. [Rule 62-210.300(1)(a) F.A.C.]

4. If the facility currently is operating any of the tanks or activities listed in the construction permit, you will need to submit an air operating permit application for those operating tanks or activities. This application should be submitted within 75 days of initial operation, as required by the construction permit. [Rules 62-4.030 and 62-210.300(1)(a) & (2), F.A.C.]

5. Please provide a copy of the survey performed by a licensed asbestos consultant to detect the presence of asbestos prior to the disturbance of piping, tankage, boilers, heaters and structures at the Gulf Terminal and Whitaker Oil Company facilities. [Rule 62-257.301, F.A.C.]

When referring to this project please use DEP file number 0050045-008-AC. The Department must receive a response from you within 15 days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-4.055(1), F.A.C.

If you have any questions, please contact Debbie Moore at 850/595-8300, extension 1230 or Deborah.L.Moore@dep.state.fl.us.

Sincerely,

/s/

Rick Bradburn
Air Program Administrator

RB/dm/c
c: Stephen Smallwood, P.E.; Air Quality Services: ssm97@comcast.net
DEP Northwest District Branch Office, Panama City

ID No.	Status / Operating Date**	Planned Use	Capacity (bbl) (1 bbl = 42 gal)	Year Manufactured *(Prev. Fac. & No.)*	Subject to NSPS (Subpart Kb)	Tank Type
Day/Blending Tanks						
DT-1		Asphalt day tank (330 F max) Nonvolatile polymer added to asphalt	3,740	2004	Yes	VFCR
DT-2		Asphalt day tank (330 F max) Nonvolatile polymer added to asphalt	3,740	Proposed	Yes	VFCR
DT-3		Asphalt day tank (330 F max) Nonvolatile polymer added to asphalt	2,450	Proposed	Yes	VFFR
DT-4		Asphalt day tank (330 F max) Nonvolatile polymer added to asphalt	2,450	Proposed	Yes	VFFR
WT-1		Asphalt day tank (330 F max) Nonvolatile polymer added to asphalt	980	1990 *(No. 14)*	Yes	VFCR
WT-2		Asphalt day tank (330 F max) Nonvolatile polymer added to asphalt	265	1976	No (pre 1984)	VFFR
WT-3		Asphalt day tank (330 F max) Nonvolatile polymer added to asphalt	265	1976	No (pre 1984)	VFFR
Storage Tanks						
1		No. 2 fuel Oil, asphalt, No.6 fuel Oil storage	20,000	1961	No (pre 1984)	VFCR
2		Asphalt storage, asphalt day tank (330 F max), No. 6 fuel oil storage	15,000	1961	No (pre 1984)	VFCR
3		Asphalt, No.6 fuel Oil storage	20,000	1961	No (pre 1984)	VFCR
4A		Asphalt, No.6 fuel Oil storage	24,000	1983 *(WOC No. 14)*	No (pre 1984)	VFCR
5		Asphalt, No.6 fuel Oil storage	35,000	1961	No (pre 1984)	VFCR
6A		Asphalt, No.6 fuel Oil storage	15,000	1979 *(WOC No. 1)*	No (pre 1984)	VFCR
7		Asphalt, No.6 fuel Oil storage	55,000	1990	Yes	VFCR
8		Anti-Strip	252	1991	No (size)	HFRT
9		Anti-Strip	72	1986	No (size)	HFRT
11		Anti-Strip	48	1986	No (size)	HFRT
12		Asphalt, No.6 fuel Oil storage	24,000	1983 *(WOC No. 15)*	No (pre 1984)	VFCR
13		Asphalt, No.6 fuel Oil storage	42,000	1986 *(WOC No. 16)*	Yes	VFCR
14		Asphalt, No.6 fuel Oil storage	24,000	1986 *(WOC No. 17)*	Yes	VFCR
15		Asphalt, No.6 fuel Oil storage	18,000	1980 *(WOC No. 11)*	No (pre 1984)	VFCR

****For tanks operating under Permit No. 0050045-007-AC, insert the word "Operating" and date operation began. If tank is still to be constructed, insert "TBC".**

Listed capacities are the cubic feet x 7.48 = shell capacity (gallons) converted to barrels (bbl) with net working capacity ~ 85% of shell capacity

No. 2 Fuel Oil Storage (110 ºF Max), Asphalt Storage (280 ºF Max), Asphalt Day Tanks (330 ºF Max), No. 6 Fuel Oil Storage (180 ºF Max), No. 6 Fuel Oil (-5API) Storage (180 ºF Max)

VFCR and VFFR – Vertical fixed roof tank with a cone or flat roof

HFRT – Horizontal fixed roof tank

WOC – Former Whitaker Oil Company

ID No.	Status / Operating Date**	Planned Use	Capacity (bbl) (1 bbl = 42 gal)	Year Manufactured *(Prev. Fac. & No.)*	Subject to NSPS (Subpart Kb)	Tank Type
Storage Tanks (cont.)						
16		Asphalt, No.6 fuel Oil storage	18,000	1980 *(WOC No. 8)*	No (pre 1984)	VFCR
17		No. 2 fuel Oil, asphalt, No.6 fuel Oil storage	18,000	1980 *(WOC No. 9)*	No (pre 1984)	VFCR
18		Asphalt, No.6 fuel Oil storage	15,000	1979 *(WOC No. 2)*	No (pre 1984)	VFCR
19		No. 2 fuel Oil, asphalt, No.6 fuel Oil storage	18,000	1980 *(WOC No. 10)*	No (pre 1984)	VFCR
21		No. 2 fuel Oil, asphalt, No.6 fuel Oil storage	18,000	1981 *(WOC No. 12)*	No (pre 1984)	VFCR
22		Asphalt, No.6 fuel Oil storage	11,000	1979 *(WOC No. 7)*	No (pre 1984)	VFCR
23		No. 2 fuel Oil, asphalt, No.6 fuel Oil storage	18,000	1981 *(WOC No. 13)*	No (pre 1984)	VFCR
24		No. 2 fuel Oil, asphalt, No.6 fuel Oil storage	428	1993 *(WOC No. 18)*	Yes	VFFR
25		No. 2 fuel Oil, asphalt, No.6 fuel Oil storage	428	1993 *(WOC No. 19)*	Yes	VFFR
26		No. 2 fuel Oil, asphalt, No.6 fuel Oil storage	428	1994 *(WOC No. 20)*	Yes	VFFR
27		No. 2 fuel Oil, asphalt, No.6 fuel Oil storage	428	1994 *(WOC No. 21)*	Yes	VFFR
28		No. 2 fuel Oil, asphalt, No.6 fuel Oil storage	428	1994 *(WOC No. 22)*	Yes	VFFR
29		No. 2 fuel oil storage	442	1999	Yes	VFCR
30		No. 2 fuel Oil, asphalt, No.6 fuel Oil storage	1,007	1964	No (pre 1984)	VFCR
40		Asphalt, No.6 fuel Oil storage	150,000	Proposed	Yes	VFCR
41		Asphalt, No.6 fuel Oil storage	150,000	Proposed	Yes	VFCR
42		Asphalt, No.6 fuel Oil storage	150,000	Proposed	Yes	VFCR
50		No. 2 fuel Oil, asphalt storage, asphalt day tank, No.6 fuel Oil storage	45,000	Proposed	Yes	VFCR
51		No. 2 fuel Oil, asphalt storage, asphalt day tank, No.6 fuel Oil storage	45,000	Proposed	Yes	VFCR
52		No. 2 fuel Oil, asphalt storage, asphalt day tank, No.6 fuel Oil storage	45,000	Proposed	Yes	VFCR
P1		Loading Rack (LR)Water*	95	1988	No (size)	HFRT
P2		Loading Rack (LR) Water*	119	1976	No (size)	HFRT
P3		Hot Pit Tank*	265	1976	No (pre 1984)	VFFR

*** Wastewater from the loading rack**
****For tanks operating under Permit No. 0050045-007-AC, insert the word "Operating" and date operation began. If tank is still to be constructed, insert "TBC".**
Listed capacities are the cubic feet x 7.48 = shell capacity (gallons) converted to barrels (bbl) with net working capacity ~ 85% of shell capacity
No. 2 Fuel Oil Storage (110 ºF Max), Asphalt Storage (280 ºF Max), Asphalt Day Tanks (330 ºF Max), No. 6 Fuel Oil Storage (180 ºF Max), No. 6 Fuel Oil (-5API) Storage (180 ºF Max)
VFCR and VFFR – Vertical fixed roof tank with a cone or flat roof
HFRT – Horizontal fixed roof tank
WOC – Former Whitaker Oil Company

Activity	**Status / Operating Date****	**Planned Use**	**Capacity**	**Year Manufactured *(Prev. Fac. & No.)***
Barge dock on Watson Bayou		Pre-heated asphalt and oil may be pumped from barge to storage tanks. Occasionally, stored product may be pumped back to barge		??
Railcar Loading/Unloading				
Two Truckloading Racks				
Hot Oil Heater			9 MMBtu	???
Hot Oil Heater			9 MMBtu	???
Hot Oil Heater			9 MMBtu	???
Vapor Combustion Unit (VCU) Flare				
Emergency Generator(s)				
Other				

ID No.	**Status / Operating Date****	**Planned Use**	**Capacity (bbl) (1 bbl = 42 gal)**	**Year Manufactured *(Prev. Fac. & No.)***	**Subject to NSPS (Subpart Kb)**	**Tank Type**
Air emitting construction activities not included in the Expiring Construction permit						
Air emitting operating activities not included in the Expiring Construction permit						

****For tanks operating under Permit No. 0050045-007-AC, insert the word "Operating" and date operation began. If tank is still to be constructed, insert "TBC".**

Listed capacities are the cubic feet x 7.48 = shell capacity (gallons) converted to barrels (bbl) with net working capacity ~ 85% of shell capacity
No. 2 Fuel Oil Storage (110 ºF Max), Asphalt Storage (280 ºF Max), Asphalt Day Tanks (330 ºF Max), No. 6 Fuel Oil Storage (180 ºF Max), No. 6 Fuel Oil (-5API) Storage (180 ºF Max)
VFCR and VFFR – Vertical fixed roof tank with a cone or flat roof
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