STATEMENT OF BASIS

Title V Air Operation Permit Revision
FINAL Permit No. : 0110048-011-AV

Applicant: The applicant for this project is Marathon Petroleum Company LP. The applicant's responsible official and mailing address are: Mr. Bradley R. Mckain, Manager, Terminals, Transport & Marine, 539 S Main Street, Findlay, Ohio, 45840.

Project Description: The purpose of this permit is to revise the Spangler Terminal existing Title V Air Operation Permit No. 0110048-006-AV to include: (1) The operation of the replacement VRU authorized by Air Construction Permit No. 01 10048-010-AC, (2) The revision of the CAM plan for the loading rack, and (3) The addition of an emergency generator diesel engine.

Facility Description: The applicant operates the Spangler Terminal, which is located at 909 SE 24th Street, Fort Lauderdale, Broward County, Florida. The facility is a bulk petroleum products and denatured ethanol storage terminal. The primary emission sources of volatile organic compounds (VOC) and hazardous air pollutants (HAP) are:

- *Floating Roof Storage Tanks* for storing petroleum products and denatured ethanol.
- *Fixed Roof Tanks* for storing additives, denatured ethanol, and petroleum contact water.
- *Loading Rack with Vapor Recovery Unit (VRU) and a Portable Backup Vapor Burner Unit (VBU)* for loading petroleum products, and gasoline/ethanol blend.
- *Piping and Equipment* include*:* Valves, fittings, and other equipment associated with petroleum products and gasoline/ ethanol blend loading operations.
- *Emergency Generator Engine*

Also included in this permit are miscellaneous insignificant emissions units and/or activities.

Primary Regulatory Requirements

Title III: The facility is a synthetic minor source of HAP.

Title V: The facility is a Title V major source of VOC in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD) synthetic minor source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAM: Compliance Assurance Monitoring (CAM) does apply to the loading rack with the VRU and the backup VBU.

Project Review

The new VRU with a total organic compounds (TOC) continuous emissions monitoring system (CEMS) was installed and tested in accordance with construction permit No. 01 10048-010-AC. The CAM plan was updated to incorporate the TOC CEMS as an indicator of compliance with the existing federally enforceable loading rack emission limit. The TOC CEMS also meets the monitoring requirements of subpart BBBBBB.

The permit is also updated to indicate that storage tanks for denatured ethanol and transmix are no longer subject to subpart BBBBBB, and to add an existing emergency generator diesel engine to the list of regulated emission units.

Conclusion

This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210, 62-213 and 214, F.A.C. In accordance with the terms and conditions of this permit, the above named permittee is hereby authorized to operate the facility as shown on the application and approved drawings, plans, and other documents, on file with the permitting authority.