

STATEMENT OF BASIS

Title V Air Operation Permit Renewal
Permit No. : 0110053-011-AV

Applicant: The applicant for this project is TPSI Terminals LLC. The applicant's responsible official and mailing address are: Mr. Dudley Tarlton, 1670 Broadway, Suite 3100, and Denver, CO 80202.

Facility Description: The applicant operates TransMontaigne Port Everglades (South), which is a bulk petroleum products and denatured ethanol storage terminal located at 2701 S.E. 14th Ave., Fort Lauderdale, Florida 33316. The primary emission sources of volatile organic compounds (VOC) and hazardous air pollutants (HAPs) are:

- *Floating Roof Storage Tanks* for storing petroleum products and denatured ethanol.
- *Fixed Roof Tanks* for storing additives, distillates, and petroleum contact water.
- *Loading Rack with vapor combustion unit (VCU)* 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.

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

Project Description: The purpose of this permitting project is to renew the existing Title V permit No. 0110053-010-AV for the above referenced facility

Processing Schedule and Related Documents

Notice of Intent to Issue Air Permit issued: 5/14/2013

Public Notice Published: 5/24/2013

Primary Regulatory Requirements

Title III: The facility is not identified as a major source of hazardous air pollutants (HAP).

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

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

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

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

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) applies to the loading rack.

CMS: Continuous monitoring system (CMS) applies to the loading rack.

Project Review

For gasoline tanks not currently complying with Subpart BBBBBB requirements, TransMontaigne shall demonstrate compliance prior to returning to gasoline service after the first degassing and cleaning activity before, but not later than, January 10, 2018.

CAM is required for the loading rack to continue to demonstrate compliance with an existing SIP limit of 10 milligrams of total organic compounds per liter of gasoline loaded. Subpart BBBBBB requires the owner or operator to maintain a CMS.

Changes from the last permit revision involve: The removal of appendices containing general Subpart BBBBBB requirements and incorporating only specific subpart BBBBBB requirements in permit conditions; upgrading Tank No. 5 floating roof seal to a mechanical shoe with a rim mounted secondary wiper to meet Subpart BBBBBB; removing the firewater tank and a storm water tank listed as insignificant activities from the site; and updating the Title V general conditions to the latest version (Appendix - TV version 2-16-12).

Conclusion

This project renews Title V air operation permit No. 0110053-010-AV. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.