Appendix CAM

Center Point Terminal Company
Jacksonville North

Permit Project No. 0310562-004-AV
Initial Title V Air Operation Permit

Compliance Assurance Monitoring Requirements

Pursuant to Rule 62-213.440(1)(b)1.a., FAC, the CAM plans that are included in this appendix contain the monitoring requirements necessary to satisfy 40 CFR 64. Conditions 1. – 17. are generic conditions applicable to all emissions units that are subject to the CAM requirements. Specific requirements related to each emissions unit are contained in the attached tables, as submitted by the applicant and approved by the Department.

40 CFR 64.6 Approval of Monitoring.

1. The attached CAM plan(s), as submitted by the applicant, are approved for the purposes of satisfying the requirements of 40 CFR 64.3.
[40 CFR 64.6(a)]

2. The attached CAM plan(s) include the following information:

a. The indicator(s) to be monitored (such as temperature, pressure drop, emissions, or similar parameter);
b. The means or device to be used to measure the indicator(s) (such as temperature measurement device, visual observation, or CEMS); and
c. The performance requirements established to satisfy 40 CFR 64.3(b) or (d), as applicable.

[40 CFR 64.6(c)(1)]

3. The attached CAM plan(s) describe the means by which the owner or operator will define an exceedance of the permitted limits or an excursion from the stated indicator ranges and averaging periods for purposes of responding to (see **CAM Conditions 5. - 9.)** and reporting exceedences or excursions (see **CAM Conditions 10. – 14.**). [40 CFR 64.6(c)(2)]

4. The permittee is required to conduct the monitoring specified in the attached CAM plan(s) and shall fulfill the obligations specified in the conditions below (see **CAM Conditions 5. - 17.**). [40 CFR 64.6(c)(3)]

40 CFR 64.7 Operation of Approved Monitoring.

5. Commencement of Operation. The owner or operator shall conduct the monitoring required under this appendix upon the effective date of this Title V permit. [40 CFR 64.7(a)]

6. Proper Maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]

7. Continued Operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. [40 CFR 64.7(c)]

8. Response to Excursions or Exceedences.

a. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions, if allowed by this permit). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

b. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[40 CFR 64.7(d)(1) & (2)]

9. Documentation of Need for Improved Monitoring. If the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. [40 CFR 64.7(e)]

40 CFR 64.8 Quality Improvement Plan (QIP) Requirements.

10. Quality Improvement Plan. Based on the results of a determination made under **CAM Condition**

b., above, the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with **CAM Condition 4.**, an accumulation of exceedences or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, may require the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices. [40 CFR 64.8(a)]

11. Elements of a QIP.

a. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.

b. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

(1) Improved preventive maintenance practices.

(2) Process operation changes.

(3) Appropriate improvements to control methods.

(4) Other steps appropriate to correct control performance.

(5) More frequent or improved monitoring (only in conjunction with one or more steps under **CAM Condition 11.b(1)** through **(4)**, above).

[40 CFR 64.8(b)]

12. If a QIP is Required. If required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined. [40 CFR 64.8(c)]

13. Following Implementation of a QIP. Upon any subsequent determination pursuant to **CAM Condition b.**, the permitting authority may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

a. Failed to address the cause of the control device performance problems; or

b. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

[40 CFR 64.8(d)]

14. Effect of QIP on Existing Requirements. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. [40 CFR 64.8(e)]

40 CFR 64.9 Reporting And Recordkeeping Requirements.

15. General Reporting Requirements.

a. Commencing from the effective date of this permit, the owner or operator shall submit monitoring reports semi-annually to the compliance authority in accordance with Rule 62-213.440(1)(b)3.a., F.A.C. In addition to deviations from any other permit requirement, the semi-annual reports shall also include all instances of deviations from the CAM requirements.

b. A report for monitoring under this part shall include, at a minimum, the information required under Rule 62-213.440(1)(b)3.a., F.A.C., and the following information, as applicable:

(1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedences, as applicable, and the corrective actions taken;

(2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(3) A description of the actions taken to implement a QIP during the reporting period as specified in **CAM Conditions 10.** through **14.** Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedences occurring.

[40 CFR 64.9(a)]

16. General Recordkeeping Requirements.

a. The owner or operator shall comply with the recordkeeping requirements specified in Rule 62-213.440(1)(b)2., F.A.C. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to **CAM Conditions 10.** through **14.** and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

[40 CFR 64.9(b)]

40 CFR 64.10 Savings Provisions.

17. Affect of CAM on Other Requirements. It should be noted that nothing in this appendix shall:

a. Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this appendix shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act,

including monitoring in permits issued pursuant to Title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under Title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.

b. Restrict or abrogate the authority of the Administrator or the permitting authority to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable.

c. Restrict or abrogate the authority of the Administrator or permitting authority to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.

[40 CFR 64.10]

EU002 Truck Rack South Tank Farm (Flare)

Part 64 Requirement	CAM Plan
	Indicator No. 1
I. Indicator 64.4(a)(1)	Operate flare with no visible emissions.
Monitoring Approach	A visible emission observation is made of the exhaust gases at the outlet of the flare during the loading of a gasoline tank truck
II. Indicator Range 64.4(a)(2) Reporting Threshold	No visible emissions. An excursion occurs if the visible emissions are observed. An excursion will trigger an investigation, corrective action, and a reporting requirement. All excursions will be reported to the ARMA in the semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representatives	Observations made by trained personnel
B. Verification of Operational Status	Visible emission observation with manual log entry.
C. QA/QC Practices and Criteria	The observers are trained on procedures in making an observation and the record keeping requirements.
D. Monitoring Frequency	At least once per week when the gasoline tank truck is loading.
E. Data Collection	Results of observations will be manually recorded and maintained on site. Records will include date, time, and result of observation or reason.
F. Averaging Period	None.

EU002 Truck Rack South Tank Farm (Flare)

Part 64 Requirement	CAM Plan
	Indicator No. 2
I. Indicator 64.4(a)(1)	Operate flare with pilot flame present at all times.
Monitoring Approach	Flame presence is monitored with thermocouple
II. Indicator Range 64.4(a)(2) Reporting Threshold	Presence of flame. An electrical signal generated from the thermocouple indicates pilot flame is present while loss of signal the pilot flame is absent. Computer interlocks ensure that no vapors are introduced into the VCU unless a pilot flame is present. If signal is lost during loading, the loading rack shits down until the problem is identified and repairs made. An excursion occurs if the pilot flame is not present. An excursion will trigger an investigation, corrective action, and a reporting requirement.
III. Performance Criteria 64.4(a)(3)	
A. Data Representatives	Thermocouple monitors the presence of a pilot flame in the VCU on a continuous basis during operation. When a VCU start up signal is present and the flame is absent or unproven the scanner signal and VCU PLC will remove the permissive signal to load at the rack
B. Verification of Operational Status	Daily check of verification of present of pilot flame when the terminal is manned.
C. QA/QC Practices and Criteria	Calibration, maintenance and operation of thermocouple according to manufacturer's specification.
D. Monitoring Frequency	The presence of a pilot light must be detected upon startup and monitored continuously during operation.
E. Data Collection	VCU faults/alarms will be recorded on a fault/alarm log by the terminal operators with date, time, reason for the fault/alarm, and action taken.
F. Averaging Period	None.

EU002 Truck Rack South Tank Farm (Flare)

Part 64 Requirement	CAM Plan
	Indicator No. 3
I. Indicator 64.4(a)(1)	Ensure no bypass of the flare is occurring.
Monitoring Approach	Inspect bypass valve seals.
IV. Indicator Range 64.4(a)(2) Reporting Threshold	Closed valve An excursion occurs if the bypass valve is not closed or sealed completely. An excursion will trigger an investigation, corrective action, and a reporting requirement. All excursions and corrective actions taken shall be reported to the ARMA in the semi-annual monitoring reports.
V. Performance Criteria 64.4(a)(3)	
A. Data Representatives	Inspections made by trained personnel.
B. Verification of Operational Status	Not Applicable.
C. QA/QC Practices and Criteria	None
D. Monitoring Frequency	At least once per month.
E. Data Collection	Results of inspection are manually recorded and maintained on site.
F. Averaging Period	None.

EU002 Truck Rack South Tank Farm (Flare)

Part 64 Requirement	CAM Plan
	Indicator No. 4
I. Indicator 64.4(a)(1)	Documentation of preventative maintenance.
Monitoring Approach	Proper VCU operation is verified by performing preventative maintenance as recommended by the VCU manufacturer four (4) times a year.
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion occurs if the preventative maintenance is not performed or documented. All excursions will be reported to the ARMA in the semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representatives	VCU operation verified by trained personnel or service person using a preventative maintenance checklist that is based on recommendations provided by the VCU manufacturer.
B. Verification of Operational Status	Not applicable.
C. QA/QC Practices and Criteria	Service persons are trained on inspection and maintenance procedures.
D. Monitoring Frequency	Preventative maintenance will be performed four (4) times during a calendar year.
E. Data Collection	Results of inspection and maintenance performed during preventative maintenance are manually recorded and maintained on site.
F. Averaging Period	None.

EU003 Truck Rack North Tank Farm

I. Indicator 64.4(a)(1)	Carbon Bed Regeneration Vacuum
Monitoring Approach	Vacuum gauge.
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion is defined as when the vacuum gauge does not reach 25 inches of mercury or greater during a daily inspection or fails to hold at 25 inches or greater for at least three minutes during a weekly inspection. An excursion will trigger an investigation, corrective action, and a reporting requirement. All excursions will be reported to the NJDEP in the semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representatives	The vacuum gauge is located on the VRU piping, approximately two feet from the shell of each carbon bed vessel. The minimum accuracy of the vacuum gauge is +/- 2.0 percent.
B. Verification of Operational Status	Daily visual check with manual log entry.
C. QA/QC Practices and Criteria	Preventative maintenance is performed on vacuum regeneration gauge four times per year and is calibrated annually.
D. Monitoring Frequency	The entire regeneration cycle will be monitored weekly. Once daily when the VRU is in operation, the vacuum pressure will be observed and recorded.
E. Data Collection	Weekly and daily visual readings when VRU is in operation with manual log entry of readings.
F. Averaging Period	None

EU003 Truck Rack North Tank Farm

Part 64 Requirements **CAM Plan Indicator No. 2**

	Indicator No. 2
I. Indicator 64.4(a)(1)	Equipment Leaks
Monitoring Approach	Monthly leak check of vapor recovery system by sight, sound, and smell.
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion is defined as detection of a leak sight, sound, and smell. An excursion will trigger an investigation, corrective action, and a reporting requirement. All excursions will be reported to the NJDEP in the semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representatives	The terminal operations personnel will be trained on the procedures to detect leaks, record results, and initiate corrective actions
B. Verification of Operational Status	N/A
C. QA/QC Practices and Criteria	The terminal operations personnel responsible for performing monthly inspections will be trained on the procedures to follow. The terminal will maintain a record of employees trained to perform the inspections.
D. Monitoring Frequency	Monthly
E. Data Collection	Manual records of inspections, leaks found, and leaks repaired.
F. Averaging Period	None

EU003 Truck Rack North Tank Farm

Part 64 Requirements **CAM Plan Indicator No. 3**

	Indicator No. 3
I. Indicator 64.4(a)(1)	Vapor Collection Line Back Pressure
Monitoring Approach	Pressure gauge reading when trucks are being loaded.
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion is defined as when the pressure gauge reading shows back pressure to be greater than 18 inches of water column. An excursion will trigger an investigation, corrective action, and a reporting requirement. All pressure gauge readings greater than 18 inches will be reported to the NJDEP in the semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representatives	A pressure gauge that is attached to a spool piece is inserted between the vapor line connection of the tanker and the connection for the terminal's vapor collection line measures back pressure The gauge measures pressure within +/- 0.1 inch of water column.
B. Verification of Operational Status	Monthly visual check on each loading bay with manual log entry.
C. QA/QC Practices and Criteria	Preventative maintenance is performed on back pressure gauge four times per year and is calibrated or replaced at least once a year.
D. Monitoring Frequency	Monthly
E. Data Collection	Monthly reading with manual log entry.
F. Averaging Period	None

EU003 Truck Rack North Tank Farm

Part 64 Requirements **CAM Plan Indicator No. 4**

I. Indicator 64.4(a)(1)	Documentation of preventative maintenance
Monitoring Approach	Proper VRU operation is verified by performing preventative maintenance as recommended by the VRU manufacture four times per year.
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion occurs if the preventative maintenance is not performed or documented. All excursions will be reported to the NJDEP in the semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representatives	VRU operation verified by trained personnel or service person using a preventative maintenance checklist that is based on recommendations provided by the VRU manufacture.
B. Verification of Operational Status	N/A
C. QA/QC Practices and Criteria	Service persons are trained on inspection and maintenance procedures
D. Monitoring Frequency	Preventative maintenance will be performed four times during a calendar year.
E. Data Collection	Results of inspection and maintenance performed during preventative maintenance are manually recorded and maintained on site.
F. Averaging Period	None