

TECHNICAL EVALUATION

AND

PRELIMINARY DETERMINATION

FOR

Marathon Petroleum Company LLC, Tampa Light Products Terminal

Hillsborough County

DRAFT/PROPOSED Air Construction Permit

Application Number

0570080-038-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

January 12, 2015

## I. Project Description

### A. Applicant:

Timothy J. Aydt  
Deputy Assistant Secretary  
Marathon Petroleum Company, LLC  
539 South Main Street  
Findlay, Ohio 45840-3229

### B. Engineer:

William F. Karl, P.E.  
Environmental Consulting & Technology, Inc.  
3701 Northwest 98<sup>th</sup> Street  
Gainesville, FL 32606-5004

P.E. No.: 67498

### C. Project and Location:

This permit authorizes optimization of the two Vapor Recovery Units (VRUs) by installing a new heat exchanger that includes a chiller system, pumps, and inter-connecting piping to each of the two VRUs, and also use of a temporary portable VCU that may be used while the VRUs are being retrofitted.

The project has been assigned the following NEDS Source Classification Code (SCC) Nos.:

- For the loading rack –
  - 4-04-001-52 (Petroleum and Solvent Evaporation, Bulk Terminals, Petroleum Liquid Storage, Vapor Collection Losses)
  - 4-04-001-54 (Petroleum and Solvent Evaporation, Bulk Terminals, Petroleum Liquid Storage, Tank Truck Vapor Leaks)
  - 1-02-006-02 (External Combustion Boilers, Industrial, Natural Gas)
  - 1-02-010-02 (External Combustion Boilers, Industrial, Propane)

The facility has been assigned SIC Industry No. 5171 – Petroleum Bulk Stations and Terminals. The project will take place at 425 South 20<sup>th</sup> Street, Tampa, FL 33605. UTM Coordinates are 17-358.54 East and 3091.79 North.

### D. Process and Controls:

This permit authorizes optimization of the two Vapor Recovery Units (VRUs) by installing a new heat exchanger that includes a chiller system, pumps, and inter-connecting piping to each of the two VRUs, and also use of a temporary portable VCU that may be used while

the VRUs are being retrofitted.

Marathon uses a Continuous Emission Monitoring (CEM) system to monitor the VOC emissions from the VRUs and the VCU. The cooling mechanism inside the VRUs use Glycol to cool off the VRUs and the vacuum pumps. The proposed new cooling system will cool the gasoline product from Tanks 96-15 and 96-16 and this chilled product will be used to further cool off the glycol. The chilled gasoline product will also be used in the absorbent tower to mist and condensate the recovered vapors for a faster and more effective recovery. The cooling system will consist of two Carrier mechanical chillers which will use Freon to chill the water circulating through them to a target design operating temperature of 50°F. The chilled water then goes to a heat exchanger where it cools the gasoline product that will be used to cool the glycol and the absorbent tower. This will optimize the operation of the VRUs resulting in the VRUs being able to operate for a longer period of time before having to shut down for cooling, and therefore, increasing the actual emissions associated with the loading rack.

Marathon is also planning on bringing a temporary portable VCU unit (RANE III, Model #3P4E11DB) on site, while the VRUs are down during the construction phase of this project. This is due to the fact that the current VCU is designed to operate when most of the lanes are in operation. Since the existing VCU is oversized, it is not efficient to be used with only a few lanes in operation, and therefore, the smaller portable VCU is more suitable to be used during low periods of operation. The VOC emissions associated with the portable VCU were estimated to be 8.3 tons based on product throughput of 2,000,000 gallons loaded through 5 lanes (portable VCU's capacity) in 100 days and the VOC permitted limit of 10 mg/l. Since Marathon is not requesting any throughput increases, the VOC PTE of the facility will not change. This portable VCU was tested by Marathon Petroleum Company LP Environmental Field Services on 6/11/2014 in Belton, South Carolina with a result of 0.56 mg/liter of VOC emissions. Since the loading rack is required to be tested on an annual basis and the VRU and the VCU are monitored by a CEM, no testing will be required after the completion of this project.

Marathon is a major source of VOC and HAP emissions. This project is subject to the following regulations:

- 40 CFR 63, Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations). The facility is exempt from 40 CFR 63 Subpart BBBBBB (Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities) pursuant to 40 CFR 63.11081(a)(1), since the facility is subject to 40 CFR 63 Subpart R.
- The loading rack is subject to 40 CFR 60, Subpart XX - Standards of Performance for Bulk Gasoline Terminals.
- Rule 62-296.508, F.A.C. - Petroleum Liquid Storage.
- Rule 62-296.510, F.A.C. - Bulk Gasoline Terminals.

The following is a list of the Emission Units affected by this project.

**EU 001** - Two Truck Loading Racks with two Vapor Recovery Units and a RANE Vapor

## Combustor Unit

### E. Application Information:

Received on: December 10, 2014

Information Requested: N/A

Application Complete: December 10, 2014

## II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes, Chapters, 62-204, 62-210, 62-212, 62-296, and 62-297, Florida Administrative Code (F.A.C.) and Chapter 1-3 of the Rules of the Environmental Protection Commission of Hillsborough County.

This project is not subject to the requirements of Rule 62-212.400, Prevention of Significant Deterioration, F.A.C. or Rule 62-212.500, New Source Review for Nonattainment Areas, F.A.C., since this project does not result in a major modification.

This project is subject to the requirements of Rule 62-212.300, General Preconstruction Review Requirements, F.A.C., since the project is not exempt from the permit requirements in Rule 62-210.300, F.A.C.

This project is subject to the requirements of Rule 62-213, Operation Permits for Major Sources of Air Pollution, F.A.C., since the facility is a Title V source by state definition.

This project is subject to the requirements of Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C., since it is source of volatile organic compounds and a potential source of odor.

This project is not subject to the requirements of Rule 62-296.401 through 62-296.470, Specific Emission Limiting and Performance Standards, F.A.C., since there is no applicable source specific category in this rule.

This project is subject to the requirements of Rule 62-296.500, F.A.C., Reasonably Available Control Technology (RACT) Volatile Organic Compounds (VOC) and Nitrogen Oxides (NOx) Emitting Facilities, because there are applicable source categories, specifically, Rule 62-296.508, F.A.C. - Petroleum Liquid Storage and Rule 62-296.510, F.A.C. - Bulk Gasoline Terminals.

This project is not subject to the requirements of Rule 62-296.600, Reasonably Available Control Technology (RACT) - Lead, F.A.C., since there is no applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.700, Reasonably Available Control Technology (RACT) – Particulate Matter, since there is no applicable source specific category in this rule.

This project is subject to the requirements of Rule 62-204.800, Federal Regulations Adopted by Reference, F.A.C., since there are applicable source specific categories in this Rule, specifically:

- 40 CFR 63, Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) since the Tampa Terminal is classified as a major HAP source.
- 40 CFR 60, Subpart XX - Standards of Performance for Bulk Gasoline Terminals.

This project is subject to the requirements of Chapter 84-446, Laws of Florida and Chapter 1-3, Rules of the Environmental Protection Commission of Hillsborough County.

### III. Summary of Emissions for the Emission Unit Modified

<u>Emission Unit</u>	<u>Potential VOC Emissions (TPY)</u>	<u>Actual VOC Emissions (TPY)</u>	<u>Emissions Increase (TPY)</u>	<u>Allowable Emissions</u>
001 - Two Truck Loading Racks	112.9	37.2	75.7	10 mg/L gas loaded

- The actual VOC emissions are based on the average of 2012 and 2013 AOR data.
- For EU 001, the potential VOC emissions are based on an emission factor of 10 mg/L of gasoline loaded and 13 mg/L of gasoline loaded into tanker trucks, assuming worst case of fugitive emissions leaks from the seals.
- The potential emissions also include 0.1 TPY due to the combustion of assist gas in the VCU.
- The facility wide VOC emissions are limited to 205.6 tons/year, which includes 0.3 tons VOC/year from the three emergency RICE engines.

### IV. Conclusions:

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., and Chapter 1-3, Rules of the Commission.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

### V. Proposed Agency Action:

Pursuant to Section 403.087, Florida Statutes and Rule 62-4.070, Florida Administrative Code the Environmental Protection Commission of Hillsborough County hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).

CERTIFIED MAIL

In the Matter of an  
Application for Permit by:

File No.: 0570080-038-AC  
County: Hillsborough

Timothy J. Aydt  
Deputy Assistant Secretary  
Marathon Petroleum Company, LLC  
539 S Main St.  
Findlay, OH 45840-3229

INTENT TO ISSUE

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP) gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated below.

On December 20, 2014, Marathon Petroleum Company, LLC, Tampa Light Products Terminal, requested authorization to optimize the two Vapor Recovery Units (VRUs) by installing a new heat exchanger that includes a chiller system, pumps, and inter-connecting piping to each of the two VRUs.

The EPC has permitting jurisdiction under Chapter 403 Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-212. The project is not exempt from permitting procedures. The EPC has determined that an air pollution construction permit is required to commence or continue operations at the described facility.

The EPC intends to issue this permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will comply with the appropriate provisions of Florida Administrative Code (F.A.C.) Chapters 62-204 through 62-297 and 62-4.

Pursuant to Section 403.815 and Rule 62-110.106(7)(a)1., F.A.C, you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days of receipt of this Intent to Issue, in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S.,

in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the EPC at the address or telephone number listed below. **The applicant shall provide proof of publication to the EPC, Air Permitting Section, at 3629 Queen Palm Drive, Tampa, Florida 33619 (Phone 813-627-2600 - FAX 813-627-2660) within 7 (seven) days of publication, pursuant to Rule 62-110.106(5), F.A.C.** Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106(9)&(11), F.A.C.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S.; or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the EPC's action is based is required to contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number if known;
- (b) The name, address, and telephone number of the petitioner and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;
- (c) A statement of how and when the petitioner received notice of the EPC action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the EPC's proposed action;
- (f) A statement of specific rules or statutes that the petitioner contends requires reversal or modification of the EPC's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, FL 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner,
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any,
- (c) Each rule or portion of a rule from which a variance or waiver is requested,
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above,
- (e) The type of action requested,
- (f) The specific facts that would justify a variance or waiver for the petitioner,
- (g) The reason by the variance or waiver would serve the purposes of the underlying statute (implemented by the rule), and
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of the those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the EPC that are relevant to the permit decision. Interested persons may contact Diana M. Lee, P.E., at the above address or call (813) 627-2600, for additional information.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Drive, Tampa, Florida 33619 and with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION COMMISSION  
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.  
Executive Director

cc: Florida Department of Environmental Protection (via email)  
William F. Karl, P.E. - Environmental Consulting & Technology, Inc. (via email)

CERTIFICATE OF SERVICE

The undersigned duly designated clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed before the close of business on \_\_\_\_\_ to the listed persons.

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated clerk, receipt of which is hereby acknowledged.

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Date

ENVIRONMENTAL PROTECTION COMMISSION OF  
HILLSBOROUGH COUNTY, as Delegated by  
  
STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
  
NOTICE OF PERMIT

Timothy J. Aydt  
Deputy Assistant Secretary  
Marathon Petroleum Company, LLC  
539 South Main Street  
Findlay, Ohio 45840

Re: Hillsborough County - AP

Dear Mr. Aydt:

Enclosed is Draft Permit Number 0570080-038-AC for the Tampa Light Products Terminal. This permit authorizes the optimization of the two Vapor Recovery Units (VRUs) by installing a new heat exchanger that includes a chiller system, pumps, and inter-connecting piping to each of the two VRUs, issued pursuant to Section 403.087, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Drive, Tampa, FL 33619; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION COMMISSION  
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.  
Executive Director

Marathon Petroleum Company, LLC  
Findlay, OH 45840

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RDG/SN/sn

cc: Florida Department of Environmental Protection (posting online)  
William F. Karl, P.E. - Environmental Consulting & Technology, Inc. (via email)

CERTIFICATE OF SERVICE

The undersigned duly designated clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed before the close of business on \_\_\_\_\_ to the listed persons.

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated clerk, receipt of which is hereby acknowledged.

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Date

PERMITTEE:  
Marathon Petroleum Company, LLC  
Tampa Light Products Terminal  
425 South 20<sup>th</sup> Street  
Tampa, FL 33605

PERMIT/CERTIFICATION  
DRAFT/PROPOSED Permit No.: 0570080-038-AC  
County: Hillsborough  
Expiration Date: July 12, 2016  
Project: Vapor Recovery Unit Upgrade

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the EPC and made a part hereof and specifically described as follows:

This permit authorizes the optimization of the two Vapor Recovery Units (VRUs) by installing a new heat exchanger that includes a chiller system, pumps, and inter-connecting piping to each of the two VRUs. This permit also authorizes the operation of a temporary portable VCU that may be used while the VRUs are being retrofitted.

This facility is a bulk terminal that handles and stores petroleum products and petroleum product additives. Gasoline, ethanol, distillates, additives, and asphalt products are received via barge or tanker and stored in above ground storage tanks. All of the products are subsequently loaded into trucks for shipment offsite or can also be delivered into the pipeline owned by Central Florida Pipeline. The operations at this facility include 29 permitted storage tanks; an asphalt heater; a barge loading operation; and two truck loading racks. Each loading rack consists of five loading bays and each loading bay has six loading arms.

The truck loading racks are controlled by two Vapor Recovery Units (VRUs), Jordan Technologies Units, Model Nos. JOR JT4-11089-2X7240, and a R. A. Nichols Vapor Combustor Unit (RANE VCU), Model No. 8E27DB, Serial No. E24/B14. Each VRU contains two activated carbon beds and regeneration equipment. The RANE VCU is the backup control device for the VRUs in case of equipment malfunction or maintenance activities.

The cooling system consists of two Carrier mechanical chillers which use Freon to chill the water circulating through them to a target design operating temperature of 50°F. The chilled water then goes to a heat exchanger where it cools the gasoline product (from Tanks 96-15 and 96-16) that is used to cool the glycol and the absorbent tower.

The portable RANE III VCU (Model #3P4E11DB) is a portable combustion system comprised of a portable equalizer tank and vapor burner. During operation a fuel pump continuously

circulates the fuel through a piping system to an internal spray nozzle, which saturates the incoming rack vapor. The saturated vapor passes through a demister to the vapor burner inlet flame arrestor. The vapor is burned with excess forced air, which is pre-heated, using the heat from the combustion chamber.

Location: 425 South 20<sup>th</sup> Street, Tampa, FL 33605

UTM: 17-358.54 E 3091.79 N NEDS NO: 0080

Emission Unit Nos.:

001 - Two Truck Loading Racks with two Vapor Recovery Units and a RANE Vapor Combustor Unit

References Permit No.: 0570080-037-AV

Replaces Permit No.: NA

PERMITTEE:  
Marathon Petroleum Company, LLC

Draft Permit/Certification No.: 0570080-038-AC  
Project: Vapor Recovery Unit Upgrade

SPECIFIC CONDITIONS:

**Facility wide conditions**

**FW1.** All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]

**FW2.** The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.

**FW3.** No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C., and Ch. 1-3.22 of the Rules of the EPCHC]

**FW4.** As requested by the permittee, in order to limit the potential to emit for both criteria and Hazardous Air Pollutants (HAP), the following potential emission limitations shall apply for any 12 consecutive month period: [Rules 62-210.200(225) and 62-4.070(3), F.A.C.]

- (a) Facility-wide Volatile Organic Compound (VOC) emissions shall not exceed 205.6 tons.
- (b) The maximum single HAP as MTBE and total HAP emissions for the facility shall not exceed 20.8 and 30.3 tons, respectively.

**FW5.** Any owner or operator subject to the provisions of this part shall furnish the EPCHC written notification as follows: [40 CFR 60.7(a)]

- (a) A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice.

**FW6.** General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department or its delegated agent, the Environmental Protection Commission of Hillsborough County. [Rule 62-296.320(1), F.A.C.]

PERMITTEE:  
Marathon Petroleum Company, LLC

Draft Permit/Certification No.: 0570080-038-AC  
Project: Vapor Recovery Unit Upgrade

**SPECIFIC CONDITIONS:**

- (a) Maintaining tightly fitting covers, lids, etc., on all containers when they are not being handled, tapped, etc.
- (b) Where possible and practical, procuring/fabricating a tightly fitting cover for any open trough, basin, etc., of VOC so that it can be covered when not in use.
- (c) Immediately attending to all spills/waste as appropriate.
- (d) Using the vapor collection system to control the vapors from every tank truck/cargo tank during the loading of any product.

**FW7.** Pursuant to Rules 62-296.320(4)(c)1., 3. and 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following: [Rule 62-296.320(4)(c)2., F.A.C.]

- (a) Maintenance of parking areas and yards.
- (b) Removal of particulate matter from paved areas, building, and work areas under the control of the owner/operator.
- (c) Reduce vehicular speed. Post limits, if necessary.

**FW8.** When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rules 62-297.310(7)(b) and 62-4.070(3), F.A.C.]

**FW9.** Submit to the Environmental Protection Commission of Hillsborough County each calendar year on or before April 1, completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year. [Rule 62-210.370(3)(c)., F.A.C.]

**FW10.** The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200, F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.200(205), 62-210.300 and 62-4.070(3), F.A.C.]

- (a) Alteration or replacement of any equipment\* or major component of such equipment.
- (b) Installation or addition of any equipment\* which is a source of air pollution.

\*Not applicable to routine maintenance, repair, or replacement of component parts of an air emissions unit

PERMITTEE:  
Marathon Petroleum Company, LLC

Draft Permit/Certification No.: 0570080-038-AC  
Project: Vapor Recovery Unit Upgrade

**SPECIFIC CONDITIONS:**

**Conditions Specific to EU 001 - Two Truck Loading Racks with two Vapor Recovery Units and a RANE Vapor Combustor Unit**

**A.1. Hours of Operation.** The following limitations shall apply: [Rules 62-4.160(2), F.A.C., 62-210.200, F.A.C.]

- (a) The hours of operation of the RANE VCU when operating with the use of assist gas shall not exceed 1,800 hours/year.
- (b) The RANE VCU is allowed to operate continuously, i.e., 8,760 hours/year, when not using assist gas.
- (c) Each VRU is allowed to operate continuously, i.e., 8,760 hours/year

**A.2.** As requested by the permittee, in order to limit the potential to emit (PTE), the maximum VOC emissions for EU 001 shall not exceed 112.9 tons per twelve consecutive month period as restricted below: [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

- (a) Maximum gasoline/denatured ethanol throughput: 1,175,000,000 gallons
- (b) Maximum diesel throughput: 700,000,000 gallons
- (c) Only natural gas or propane shall be used as assist gas for the RANE VCU

**A.3.** Emissions to the atmosphere from the vapor collection and processing systems (the VRUs, the RANE VCU, and the portable RANE III VCU) due to the loading of gasoline cargo tanks shall not exceed 10 milligrams of total organic compounds per liter of gasoline loaded. [40 CFR 63.422(b) and Permit Application Received on December 10, 2014]

**A.4.** The permittee shall comply with the following requirements: [40 CFR 63.422, 40 CFR 60.502]

- (a) Each loading rack shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks/cargo tanks during product loading.
- (b) Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack.
- (c) Loadings of liquid product into gasoline tank trucks/cargo tanks shall be limited to vapor-tight gasoline tank trucks/cargo tanks using the following procedures:
  - (1) The permittee shall obtain the vapor tightness documentation described in Specific Condition A.16. for each gasoline tank truck/cargo tank which is to be loaded at the loading racks.
  - (2) The permittee shall require the tank identification number to be recorded as each gasoline tank truck/cargo tank is loaded at the loading racks.
  - (3) The permittee shall cross-check each tank identification number obtained in paragraph (c)(2) of this Specific Condition with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded.
  - (4) The permittee shall notify the owner or operator of each nonvapor-tight gasoline tank truck/cargo tank loaded at the loading racks within 3 weeks after the loading has occurred.

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- (5) The permittee shall take steps assuring that the nonvapor-tight gasoline cargo tank will not be reloaded at the facility until vapor tightness documentation for that gasoline cargo tank is obtained which documents that:
- (i) The gasoline cargo tank meets the applicable test requirements in Specific Condition A.10.
  - (ii) For each gasoline cargo tank failing the test in Specific Condition A.11. or A.12. at the facility, the cargo tank either: (A) Before repair work is performed on the cargo tank, meets the test requirements in Specific Condition A.12. or A.13., or (B) After repair work is performed on the cargo tank before or during the tests in Specific Condition A.12. or A.13., subsequently passes the annual certification test described in Specific Condition A.10.
- (d) The permittee shall act to assure that loadings of gasoline tank trucks/cargo tanks at the loading racks are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.
- (e) The permittee shall act to assure that the terminal's and the tank truck's/cargo tank's vapor collection systems are connected during each loading of a gasoline tank truck/cargo tank at the loading racks. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks.
- (f) The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured during the performance test.
- (g) No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).

**A.5.** The permittee shall not load gasoline into any tank, trucks or trailers from any bulk gasoline terminal unless a means is provided to prevent liquid waste from the loading device to exceed the quantity specified for the self sealing coupler or adapter according to API regulation RP 1004 (or equivalent) upon the loading device being disconnected or when it is not in use (the above referenced are available from the American Petroleum Institute, 1220 "L" Street N.W., Washington, D.C. 20005). [Rule 62-296.510(3)(b), F.A.C.]

**A.6.** Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. No trucks shall be hooked up for filling once the equipment or process failure is recognized. Truck loading shall restart only after the problem is completely resolved. [Rule 62-210.700, F.A.C.]

**A.7.** For the loading racks (EU 001), the Environmental Protection Commission of Hillsborough County deems necessary and orders the permittee to use submerged filling techniques (bottom loading). The Environmental Protection Commission of Hillsborough County finds the submerged filling technique as known and existing vapor emissions controls. [Rule 62-296.320(1)(a), F.A.C.]

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**A.8.** As requested by the permittee, in accordance with the performance test conducted in March 2008, the RANE VCU temperature shall be maintained at a minimum 6-hour average temperature of 445 °F during operation. [Rule 62-4.070(3), F.A.C., 40 CFR 63.425(b) and Permit No. 0570080-032-AC]

**A.9.** For performance tests performed after the initial test, the permittee shall document the reasons for any change in the operating parameter value since the previous performance test. [40 CFR 63.425(c) and Title V Permit No. 0570080-030-AV]

**A.10. Annual certification test.** The annual certification test for gasoline cargo tanks shall consist of the following test methods and procedures: [40 CFR 63.425(e)]

- (a) Method 27, Appendix A, 40 CFR 60. Conduct the test using a time period (t) for the pressure and vacuum tests of 5 minutes. The initial pressure ( $P_i$ ) for the pressure test shall be 460 mm H<sub>2</sub>O (18 in. H<sub>2</sub>O), gauge. The initial vacuum ( $V_i$ ) for the vacuum test shall be 150 mm H<sub>2</sub>O (6 in. H<sub>2</sub>O), gauge. The maximum allowable pressure and vacuum changes (-p, -v) are as shown in the second column of Table 1.
- (b) Pressure test of the cargo tank's internal vapor valve as follows:
  - (1) After completing the tests under paragraph (a) of this Specific Condition, use the procedures in Method 27 to repressurize the tank to 460 mm H<sub>2</sub>O (18 in. H<sub>2</sub>O), gauge. Close the tank's internal vapor valve(s), thereby isolating the vapor return line and manifold from the tank.
  - (2) Relieve the pressure in the vapor return line to atmospheric pressure, then reseal the line. After 5 minutes, record the gauge pressure in the vapor return line and manifold. The maximum allowable 5-minute pressure increase is 130 mm H<sub>2</sub>O (5 in. H<sub>2</sub>O).

TABLE 1 - ALLOWABLE CARGO TANK TEST PRESSURE OR VACUUM CHANGE

Cargo Tank or Compartment Capacity, liters (gal)	Annual Certification- Allowable Pressure or Vacuum Change (-p, -v) in 5 Minutes, mm H <sub>2</sub> O (in. H <sub>2</sub> O)	Allowable Pressure Change (-p) in 5 Minutes at any time, mm H <sub>2</sub> O (in. H <sub>2</sub> O)
9,464 or more (2,500 or more)	25 (1.0)	64 (2.5)
9,463 to 5,678 (2,499 to 1,500)	38 (1.5)	76 (3.0)
5,679 to 3,785 (1,499 to 1,000)	51 (2.0)	89 (3.5)
3,782 or less (999 or less)	64 (2.5)	102 (4.0)

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**A.11. Leak detection test.** The leak detection test shall be performed using Method 21, Appendix A, 40 CFR 60, except omit section 4.3.2 of Method 21. A vapor-tight gasoline cargo tank shall have no leaks at any time when tested according to the procedures in this paragraph. [40 CFR 63.425(f)]

- (a) The leak definition shall be 21,000 ppm as propane. Use propane to calibrate the instrument, setting the span at the leak definition. The response time to 90 percent of the final stable reading shall be less than 8 seconds for the detector with the sampling line and probe attached.
- (b) In addition to the procedures in Method 21, include the following procedures:
  - (1) Perform the test on each compartment during loading of that compartment or while the compartment is still under pressure.
  - (2) To eliminate a positive instrument drift, the dwell time for each leak detection shall not exceed two times the instrument response time. Purge the instrument with ambient air between each leak detection. The duration of the purge shall be in excess of two instrument response times.
  - (3) Attempt to block the wind from the area being monitored. Record the highest detector reading and location for each leak.

**A.12. Nitrogen pressure decay field test.** For those cargo tanks with manifolded product lines, this test procedure shall be conducted on each compartment. [40 CFR 63.425(g)]

- (a) Record the cargo tank capacity. Upon completion of the loading operation, record the total volume loaded. Seal the cargo tank vapor collection system at the vapor coupler. The sealing apparatus shall have a pressure tap. Open the internal vapor valve(s) of the cargo tank and record the initial headspace pressure. Reduce or increase, as necessary, the initial headspace pressure to 460 mm H<sub>2</sub>O (18.0 in. H<sub>2</sub>O), gauge by releasing pressure or by adding commercial grade nitrogen gas from a high pressure cylinder capable of maintaining a pressure of 2,000 psig.
  - (1) The cylinder shall be equipped with a compatible two-stage regulator with a relief valve and a flow control metering valve. The flow rate of the nitrogen shall be no less than 2 cfm. The maximum allowable time to pressurize cargo tanks with headspace volumes of 1,000 gallons or less to the appropriate pressure is 4 minutes. For cargo tanks with a headspace of greater than 1,000 gallons, use as a maximum allowable time to pressurize 4 minutes or the result from the equation below, whichever is greater.

$$T = V_h \times 0.004$$

where:

T = maximum allowable time to pressurize the cargo tank, min;

V<sub>h</sub> = cargo tank headspace volume during testing, gal.

- (b) It is recommended that after the cargo tank headspace pressure reaches approximately 460 mm H<sub>2</sub>O (18 in. H<sub>2</sub>O), gauge, a fine adjust valve be used to adjust the headspace pressure to 460 mm H<sub>2</sub>O (18.0 in. H<sub>2</sub>O), gauge for the next 30 ± 5 seconds.

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- (c) Reseal the cargo tank vapor collection system and record the headspace pressure after 1 minute. The measured headspace pressure after 1 minute shall be greater than the minimum allowable final headspace pressure ( $P_f$ ) as calculated from the following equation:

$$P_f = 18 \left( (18 - N) / 18 \right)^{(V_s / 5V_h)}$$

where:

- $P_f$  = minimum allowable final headspace pressure, in. H<sub>2</sub>O, gauge;
- $V_s$  = total cargo tank shell capacity, gal;
- $V_h$  = cargo tank headspace volume after loading, gal;
- 18.0 = initial pressure at start of test, in. H<sub>2</sub>O, gauge;
- N = 5-minute continuous performance standard at any time from the third column of Table 1, in. H<sub>2</sub>O.

- (d) Conduct the internal vapor valve portion of this test by repressurizing the cargo tank headspace with nitrogen to 460 mm H<sub>2</sub>O (18 in. H<sub>2</sub>O), gauge. Close the internal vapor valve(s), wait for 30 ± 5 seconds, then relieve the pressure downstream of the vapor valve in the vapor collection system to atmospheric pressure. Wait 15 seconds, then reseal the vapor collection system. Measure and record the pressure every minute for 5 minutes. Within 5 seconds of the pressure measurement at the end of 5 minutes, open the vapor valve and record the headspace pressure as the "final pressure."
- (e) If the decrease in pressure in the vapor collection system is less than at least one of the interval pressure change values in Table 2, or if the final pressure is equal to or greater than 20 percent of the 1-minute final headspace pressure determined in the test in paragraph (c) of this Specific Condition, then the cargo tank is considered to be a vapor-tight gasoline cargo tank.

TABLE 2 - PRESSURE CHANGE FOR INTERNAL VAPOR VALVE TEST

Time Interval	Interval Pressure Change, mm H <sub>2</sub> O (in. H <sub>2</sub> O)
After 1 minute	28 (1.1)
After 2 minutes	56 (2.2)
After 3 minutes	84 (3.3)
After 4 minutes	112 (4.4)
After 5 minutes	140 (5.5)

**A.13. Continuous performance pressure decay test.** The continuous performance pressure decay test shall be performed using Method 27, Appendix A, 40 CFR 60. Conduct only the positive pressure test using a time period (t) of 5 minutes. The initial pressure ( $P_i$ ) shall be 460 mm H<sub>2</sub>O (18 in. H<sub>2</sub>O), gauge.

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The maximum allowable 5-minute pressure change (-p) which shall be met at any time is shown in the third column of Table 1. [40 CFR 63.425(h)]

**A.14.** The permittee shall comply with the following requirements for the loading racks: [40 CFR 63.427(a) and (b)]

- (a) The permittee shall install, calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a continuous monitoring system (CMS) as follows:
  - (1) For the carbon adsorption system, a continuous emission monitoring system (CEMS) capable of measuring organic compound concentration shall be installed in the exhaust air stream.
  - (2) For the RANE Vapor Combustor Unit, a continuous parameter monitoring system (CPMS) capable of measuring temperature must be installed in the firebox or in the ductwork immediately downstream from the firebox in a position before any substantial heat exchange occurs.
- (b) The permittee shall operate the vapor processing system in a manner not to exceed the operating parameter value for the parameter described in paragraph (a)(1) or paragraph (a)(2) of this Specific Condition and established during the compliance test. Operation of the vapor processing system in a manner exceeding the operating parameter value of paragraph (a)(1) for the VRUs, as specified above, or going below the operating parameter value of paragraph (a)(2) for the RANE VCU, as specified above, shall constitute a violation of the emission standard in Specific Condition A.3.

**A.15.** The permittee shall keep records of the test results for each gasoline cargo tank loading at the facility as follows: [40 CFR 63.428(b) and Title V Permit No. 0570080-030-AV]

- (a) Annual certification testing performed under Specific Condition A.10.; and
- (b) Continuous performance testing performed at any time at that facility under Specific Conditions A.11., A.12., and A.13.
- (c) The documentation file shall be kept up-to-date for each gasoline cargo tank loading at the facility. The documentation for each test shall include, as a minimum, the following information:
  - (1) Name of test:
    - Annual Certification Test--Method 27 [§63.425(e)(1)],
    - Annual Certification Test--Internal Vapor Valve [§63.425(e)(2)],
    - Leak Detection Test [§63.425(f)],
    - Nitrogen Pressure Decay Field Test [§63.425(g)], or
    - Continuous Performance Pressure Decay Test [§63.425(h)].
  - (2) Cargo tank owner's name and address.
  - (3) Cargo tank identification number.
  - (4) Test location and date.
  - (5) Tester name and signature.
  - (6) Witnessing inspector, if any: Name, signature, and affiliation.

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- (7) Vapor tightness repair: nature of repair work and when performed in relation to vapor tightness testing.
- (8) Test results: pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument and leak definition.

**A.16.** The permittee shall: [40 CFR 63.428(c)]

- (a) Keep an up-to-date, readily accessible record of the continuous monitoring data required under Specific Condition A.14.(a)(1) and (2). This record shall indicate the time intervals during which loadings of gasoline cargo tanks have occurred or, alternatively, shall record the operating parameter data only during such loadings. The date and time of day shall also be indicated at reasonable intervals on this record.
- (b) Record and report simultaneously with the notification of compliance status required under 40 CFR 63.9(h) (see Attachment GP-1). All data and calculations, engineering assessments, and manufacturer's recommendations used in determining the operating parameter values during the compliance test.

**A.17.** The permittee shall keep documentation of all notifications required under Specific Condition A.4.(c)(4) on file at the terminal for at least 5 years. [40 CFR 60.505(d), Rule 62-213.440(1)(b)2.b., F.A.C.]

**A.18.** The permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least 5 years. [40 CFR 60.505(f), Rule 62-213.440(1)(b)2.b., F.A.C.]

**A.19. Semiannual Report.** The permittee shall include in a semiannual report to the Environmental Protection Commission of Hillsborough County the following information, as applicable: Each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility. [40 CFR 63.428(g)(1)]

**A.20. Excess Emissions Report.** The permittee shall submit an excess emissions report to the Environmental Protection Commission of Hillsborough County in accordance with 40 CFR 63.10(e) (see Attachment GP-1), whether or not a CMS is installed at the facility. The following occurrences are excess emissions events under 40 CFR 63, Subpart R, and the following information shall be included in the excess emissions report as applicable: [40 CFR 63.428(h)(1)-(3)]

- (a) Each exceedance or failure to maintain, as appropriate, the monitored operating parameter value determined during compliance testing. The report shall include the monitoring data for the days on which exceedances or failures to maintain have occurred, and a description and timing of the steps taken to repair or perform maintenance on the vapor collection and processing systems or the CMS.

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- (b) Each instance of a nonvapor-tight gasoline cargo tank loading at the facility in which the permittee failed to take steps to assure that such cargo tank would not be reloaded at the facility before vapor tightness documentation for that cargo tank was obtained.
- (c) Each reloading of a nonvapor-tight gasoline cargo tank at the facility before vapor tightness documentation for that cargo tank is obtained by the facility in accordance with Specific Condition A.4.(c)(5).

**A.21.** Compliance with the emission limitations of Specific Conditions. FW4. and A.2. shall be demonstrated through the use of a monthly recordkeeping system. The recordkeeping system shall contain the following information and be made available for inspection by the Environmental Protection Commission of Hillsborough County for the most recent 5 year period: [Rule 62-213.440(1)(b)2.b., F.A.C. and Title V Permit No. 0570080-030-AV]

- (a) Month, Year
- (b) Product(s) Loaded
- (c) Product Throughput (gallons)
- (d) Most recent twelve month rolling total of Product Throughput (gallons)
- (e) Monthly and 12-month rolling totals of VOC and HAP emissions

ENVIRONMENTAL PROTECTION COMMISSION  
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.  
Executive Director