

TECHNICAL EVALUATION  
AND  
PRELIMINARY DETERMINATION  
FOR

Buckeye Terminals, LLC

Hillsborough County

Construction Permit

Application Number

0570083-022-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

August 14, 2014

## I. Project Description

### A. Applicant:

Michael Miller  
Operations Manager  
Buckeye Terminals, LLC  
848 McCloskey Blvd.  
Tampa, FL 33605

### B. Engineer:

Robert A. Baker, P.E.  
Baker Environmental Engineering, Inc.  
3000 North Ponce de Leon Blvd., Suite 4  
St Augustine, FL 32084

### C. Project and Location:

This permit authorizes the construction of three new pipelines that will be used to transport petroleum products from ships and barges to Buckeye's storage tanks. The project has been assigned the NEDS Source Classification Code No. 4-04-001-50 - Petroleum and Solvent Evaporation, Bulk Terminals, Miscellaneous Losses.

The Standard Industrial Code for the project is No. 5171, Wholesale Trade, Nondurable Goods, Petroleum Bulk Stations & Terminals. The project is located at 848 McCloskey Blvd., Tampa, FL 33605. UTM Coordinates of the location are 17-357.8 E and 3092.2 N.

### D. Process and Controls:

Buckeye Terminals receives gasoline, diesel, and additives by ship, truck, and pipeline. The gasoline received by pipeline can have a maximum MTBE content of 1.2% by weight. Denatured ethanol consisting of approximately 5% gasoline and 95% ethanol (ethyl alcohol) is received by ship or truck. The petroleum products are transferred and stored in a total of 13 fixed and floating roof storage tanks and then distributed into tanker trucks through the loading rack with three loading bays or through a pipeline.

The terminal also receives denatured ethanol by truck at the denatured ethanol truck station. The station has one truck unloading and loading arm and is located on a skid next to the truck loading rack. When denatured ethanol is unloaded from trucks, it is pumped to the storage tanks. Trucks unloading denatured ethanol are under negative pressure. The denatured ethanol truck station can also be used to load trucks with denatured ethanol that is pumped from the storage tanks. Only denatured ethanol is loaded into trucks at this station.

VOC emissions from the truck loading rack and from the loading of ethanol by truck are

controlled by a refurbished John Zink Carbon Vapor Recovery Unit (VRU), Series No. S71294A, or a John Zink Company air assisted, Vapor Combustion Unit (VCU), Model No. S91634-702.

Tanks 18, 19, 29, 33, 34, 35, 36, 50, and 51 are internal floating roof tanks and typically store gasoline, ethanol, or petroleum contact water. Tanks 40, 41, 42, and Slop are fixed roof tanks and typically store diesel fuel, additives, or slop. The storage tanks may store a variety of liquids as long as the annual average liquid vapor pressure of the stored liquid is equal to or less than the maximum annual average vapor pressure allowed in each tank group.

The construction of the new pipelines includes the installation 38 new valves and 64 new flanges. The VOC emissions from these valves and flanges are calculated to be 0.02 tons/year based on EPA 453/R-95-017, Protocol for Equipment Leak Emission Estimates, November 1995. The facility-wide VOC PTE remains at 89.8 TPY, which includes 11.0 TPY and 0.4 TPY from storage tank degassing and equipment leaks, respectively.

The facility is subject to 40 CFR 60 Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels) and 40 CFR 60 Subpart XX (Standards of Performance for Bulk Gasoline Terminals). Also, the facility is subject to the State regulations under Rule 62-296.508, F.A.C. (Petroleum Liquid Storage) and Rule 62-296.510, F.A.C. (Bulk Gasoline Terminals).

In addition, the facility is subject to 40 CFR 63 Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. This NESHAP has not been adopted by the State of Florida.

E. Application Information:

Received on: July 31, 2014

Information Requested: N/A

Application Complete: July 31, 2014

## II. Rule Applicability

This project is subject to the pre-construction 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 Non-attainment Areas, F.A.C., since the facility is a synthetic minor facility by state definition.

This project is subject to the requirements of Rule 62-212.300, General Preconstruction Review Requirements, 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 62-296.320, General Pollutant Emission Limiting Standards, F.A.C., since the project is a source of VOC emissions 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 not an applicable category for this source.

This project is subject to the requirements of Rule 62-296.500, Reasonably Available Control Technology for VOCs, F.A.C., since there is an applicable source category for this source, specifically, 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 for lead, F.A.C., since there is not an applicable category for this source.

This project is not subject to the requirements of Rule 62-296.700, Reasonably Available Control Technology for Particulate Matter, F.A.C., since there is not an applicable category for this source.

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 60 Subpart XX Standards of Performance for Bulk Gasoline Terminals and 40 CFR 63 Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. However, 40 CFR 63 Subpart BBBBBB has not been adopted by the State of Florida.

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

#### Volatile Organic Compound Emissions

<b>Emission Unit (EU) No.</b>	<b>Description</b>	<b>Potential VOC Emissions (tons/yr)</b>	<b>Actual VOC Emissions (tons/yr)</b>	<b>Increase in VOC Emissions (tons/yr)</b>	<b>Allowable</b>
003	Truck Loading Rack with VRU and VCU (includes fugitive leaks)	51.4	13.0	38.4	20 mg/L
	<b>Total for EU No. 003</b>	<b>51.4</b>	<b>13.0</b>	<b>38.4</b>	

- Actual Emissions are based on the average of 2012 and 2013 AOR Data.
- The potential and allowable VOC emissions for EU No. 003 are based on 20 mg/L of gasoline loaded from the VRU/VCU and 13 mg/L of gasoline loaded from fugitive emissions at the loading rack. Also, the potential VOC emissions for EU No. 003 include 0.4 TPY from fugitive equipment leaks. The fugitive equipment leak emissions are based on emission factors from Equipment Leak Emission Estimates, EPA 453/R-95-017, November 1995. The number of components is based on a similarly sized facility.

Inventory of Title III pollutants is estimated to be less than 10 TPY individually and less than 25 TPY collectively.

#### 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:

Michael Miller  
Operations Manager  
Buckeye Terminals, LLC  
848 McCloskey Blvd.  
Tampa, FL 33605

File No.: 0570083-022-AC  
County: Hillsborough

**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.

The applicant, Buckeye Terminals, LLC, applied on July 31, 2014, to the EPC for an air construction permit to construct three new pipelines that will be used to transport the petroleum products from ships and barges to Buckeye's storage tanks. The facility, a synthetic minor source, is located at 848 McCloskey Blvd., Tampa, FL 33605.

The EPC has permitting jurisdiction under Chapter 403 Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-210. 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 403.0872, F.S. and Rules 62-103.150 and 62-210.350(3), 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 as soon as possible, 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 Dr., Tampa, Florida 33619 (Phone 813-627-2600 - FAX 813-627-2660) within 7 (seven) days of publication. 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 62-103.150(6), 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 Dr., 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 must 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 Dr., 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, Southwest District (posting online)  
Robert A. Baker, P.E. – Baker Environmental Engineering, Inc. (via email)



ENVIRONMENTAL PROTECTION COMMISSION  
OF HILLSBOROUGH COUNTY  
NOTICE OF INTENT TO ISSUE PERMIT

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 air pollution Permit No. 0570083-022-AC to Buckeye Terminals, LLC, to construct three new pipelines that will be used to transport petroleum products from ships and barges to Buckeye's storage tanks. The facility, a synthetic minor source, is located at 848 McCloskey Blvd., Tampa, FL 33605.

A Best Available Control Technology (BACT) determination was not required.

The EPC will issue the Final permit with the conditions of the DRAFT permit unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. before the deadline for filing a petition. The procedures for petitioning for 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 Dr., 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 of the F.A.C.

A petition that disputes the material facts on which the EPC's action is based must 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 agency determination;
- (c) A statement of how and when 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 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.

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.

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 Dr., 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.

The complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Environmental Protection Commission of Hillsborough County, 3629 Queen Palm Dr., Tampa, FL 33619. The complete project file includes the proposed Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Diana M. Lee, P.E., at the above address, or call 813-627-2600, for additional information. Any written comments filed shall be available for public inspection. If written comments received result in a significant change in the proposed agency action, the EPC shall revise the proposed permit and require, if applicable, another Public Notice.

ENVIRONMENTAL PROTECTION COMMISSION OF  
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Michael Miller  
Operations Manager  
Buckeye Terminals, LLC  
848 McCloskey Blvd.  
Tampa, FL 33605

Dear Mr. Miller:

Enclosed is Permit Number 0570083-022-AC to construct three new pipelines that will be used to transport the petroleum products from ships and barges to Buckeye's storage tanks, 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 Dr., Tampa, Florida 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.

Sincerely,

Richard D. Garrity, Ph.D.  
Executive Director

RDG/LAW/law

Buckeye Terminals, LLC  
Tampa, FL 33605

Page Two

cc: Florida Department of Environmental Protection, Southwest District (posting online)  
Robert A. Baker, P.E. – Baker Environmental Engineering, Inc. (via email)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT 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:  
Buckeye Terminals, LLC  
Tampa Terminal  
848 McCloskey Boulevard  
Tampa, FL 33605

PERMIT/CERTIFICATION  
Permit No.: 0570083-022-AC  
County: Hillsborough  
Expiration Date: August 14, 2015  
Project: New Ship/Barge Unloading Pipelines

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 construction of three new pipelines that will be used to transport the petroleum products from ships and barges to Buckeye's storage tanks. The construction of the new pipelines includes the installation of 38 new valves and 64 new flanges. The facility receives gasoline, diesel, and additives by ship, truck, and pipeline. The gasoline received by pipeline can have a maximum MTBE content of 1.2% by weight. Denatured ethanol consisting of approximately 5% gasoline and 95% ethanol (ethyl alcohol) is received by ship or truck. The petroleum products are transferred and stored in a total of 13 fixed and floating roof storage tanks and then distributed into tanker trucks through the loading rack with three loading bays or through a pipeline.

The terminal also receives denatured ethanol is received by truck at the denatured ethanol truck station. The station has one truck unloading and loading arm and is located on a skid next to the truck loading rack. When denatured ethanol is unloaded from trucks, it is pumped to the storage tanks. Trucks unloading denatured ethanol are under negative pressure. The denatured ethanol truck station can also be used to load trucks with denatured ethanol that is pumped from the storage tanks. Only denatured ethanol is loaded into trucks at this station.

VOC emissions from the truck loading rack and from the loading of ethanol by truck are controlled by a refurbished John Zink Carbon Vapor Recovery Unit (VRU), Series No. S71294A, or a John Zink Company air assisted, Vapor Combustion Unit (VCU), Model No. S91634-702.

The facility is also subject to 40 CFR 63 Subpart BBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. This NESHAP has not been adopted by the State of Florida.

Emission Unit No.:

003 - Denatured Ethanol Station and Truck Loading Rack with VRU or VCU

Location: 848 McCloskey Blvd., Tampa, FL 33605

UTM: 17- 357.79E 3092.00N NEDS No.: 0083

References Permit Nos.: 0570083-014-AC, 0570083-016-AC, and 0570083-020-AF

Replaces Permit No.: NA

PERMITTEE:  
Buckeye Terminals, LLC

PERMIT/CERTIFICATION NO.: 0570083-022-AC  
PROJECT: New Ship/Barge Unloading Pipelines

SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]
2. 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.]
3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]
4. The permittee shall not 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.]
5. 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.
6. As requested by the permittee, in order to limit the potential to emit and establish the facility as a synthetic minor for both criteria and Hazardous Air Pollutants (HAP), the following emission limitations shall apply: [Rules 62-4.070(3), 62-210.200 and 62-212.300, F.A.C. and Permit No. 0570083-020-AF]
  - A) The maximum potential VOC emissions from the entire facility shall not exceed 89.8 tons for any 12 consecutive month period. This includes fugitive emissions and emissions from degassing the storage tanks.
  - B) The maximum potential VOC emissions from the loading rack shall not exceed 51.4 tons for any 12 consecutive month period, which includes emissions from fugitive equipment leaks.
  - C) The maximum potential VOC emissions from the storage tanks shall not exceed 38.4 tons for any 12 consecutive month period, which includes 11.0 TPY emissions from degassing of the storage tanks.
  - D) Hazardous Air Pollutant (HAP), as defined in Rule 62-210.200, F.A.C., emissions shall be less than 10 tons in any 12 consecutive month period for any individual HAP and less than 25 tons in any 12 consecutive month period for any combination of HAPs.
7. No marine loading is permitted without prior written approval from the Environmental Protection Commission of Hillsborough County. [Rule 62-4.070(3) F.A.C. and Permit No. 0570083-014-AC]
8. In order to ensure compliance with Specific Condition No. 6, the MTBE content of the gasoline shall not exceed 1.2% by weight. [Rule 62-4.070(3), F.A.C. and Permit No. 0570083-016-AC]

PERMITTEE:  
Buckeye Terminals, LLC

PERMIT/CERTIFICATION NO.: 0570083-022-AC  
PROJECT: New Ship/Barge Unloading Pipelines

SPECIFIC CONDITIONS:

**Loading Rack**

9. In order to limit the potential to emit, the following limitations and restrictions shall apply: [40 CFR 60.502(a),(b), and(d), Rules 62-4.070(3) and 62-296.510(3), F.A.C. and Permit Nos. 0570083-016-AC and 0570083-020-AF]

- A) Emissions from the truck loading rack and the denatured ethanol loading station shall not exceed 20 mg VOC/L of gasoline loaded.
- B) Fugitive emissions from the loading rack shall not exceed 13 mg VOC/L of gasoline loaded.
- C) All displaced vapors from truck loading rack and the denatured ethanol station shall be routed to either the vapor recovery unit or the vapor combustion unit.
- D) The permittee shall maintain flow meters to accurately determine the throughput of the loading rack, denatured ethanol station, and storage tanks.
- E) The maximum combined volatile organic liquid (VOL) throughput through the truck loading rack and the denatured ethanol loading station shall not exceed 370,000,000 gallons per 12 consecutive month period.

10. The permittee shall prevent the loading of liquid product into non-vapor tight tank trucks using the following procedures: [40 CFR 60.502(e) and Rule 62-4.070(3), F.A.C.]

- A) The permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) (Specific Condition No. 25) for each gasoline tank truck which is to be loaded at the affected facility.
- B) The permittee shall require the tank identification number to be cross-checked as each gasoline tank truck is loaded at the affected facility.
- C) The permittee shall not allow loading of liquid product into a gasoline tank truck unless it has current valid vapor tightness documentation. This documentation shall be cross-checked by the facility's automation system for each gasoline tank truck prior to loading and, if the truck's vapor tightness documentation is not valid, the gasoline tank truck will not be allowed to load.
- D) The permittee shall notify the owner or operator of each non-vapor tight gasoline tank truck that attempts to load at the facility within 1 week of the documentation cross-check.
- E) The permittee shall take steps assuring that the non-vapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained.

11. The denatured ethanol unloading operations shall comply with the following terms and conditions: [Rule 62-4.070(3), F.A.C. and Permit No. 0570083-014-AC]

- A) Ship/Barge Unloading of Denatured Ethanol
  - i) The permittee shall use good air pollution control practices to minimize emissions.

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- ii) Ballasting of the marine vessel which results in the discharge of hydrocarbon vapors to the outside air is prohibited while operating inside the waters of Tampa Bay.
- iii) All openings on the vessel which can be closed during product unloading and storage shall be closed to the extent practical.

B) Truck Unloading of Denatured Ethanol

- i) The permittee shall use good air pollution control practices to minimize emissions.
- ii) During unloading, the pressure at the tanker trucks shall remain negative to prevent excess vapor loss.

12. The owner or operator shall act to assure that loadings of gasoline tank trucks at the affected facility are made only into tank trucks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system. [Rule 40 CFR 60.502(f) and Rule 62-4.070(3), F.A.C.]

13. The owner or operator shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks. [Rule 40 CFR 60.502(g) and Rule 62-4.070(3), F.A.C.]

14. 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 by the procedures specified in 40 CFR 60.503(d) (Specific Condition No. 298.). [Rule 40 CFR 60.502(h) and Rule 62-4.070(3), F.A.C.]

15. 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). [40 CFR 60.502(i) and Rule 62-4.070(3), F.A.C.]

16. A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with  $\pm 2.5$  mm of water precision, shall be calibrated and installed on the terminal's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline tank truck. [40 CFR 60.503(d)(1), Rule 62-4.070(3), F.A.C.]

17. During periods of loading or unloading operations there shall be no reading greater than or equal to 100% of the lower explosive level (LEL) measured as propane at 1 in. (2.5 centimeters) around the perimeter of any potential leak as detected by a combustible gas detector using the procedure described in Appendix B of EPA 450/2-78-051. [Rules 62-4.070(3) and 62-297.440(2)(b)2.a., F.A.C.]

18. During operation of the Carbon Adsorption Vapor Processing Systems, a deep vacuum shall be reached in the carbon bed during the regeneration cycle, and that maximum vacuum shall be a minimum of 26 inches mercury or the maximum average vacuum pressure obtained during the most recent annual

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compliance stack test. In addition, the carbon bed operating temperature shall be a maximum of either 130°F, or 10% above the operating temperature recorded during the last successful compliance test, whichever is higher. The vacuum readings and operating temperatures shall be checked and recorded weekly for each Carbon Adsorption Vapor Processing System during loading operations at the loading rack. If the vacuum is less than 26 inches mercury or the temperature is greater than the maximum specified above, the facility shall immediately implement corrective actions, record all these incidents, and report to the EPC within 24 hours of the incident. Failure to adhere to the monitoring requirements specified in this condition does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C. [Rule 62-4.070(3), F.A.C. and Permit Nos. 0570083-016-AC and 0570083-020-AF]

19. Each calendar month, the vapor collection system, the vapor processing system, and the loading rack shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. The leak detection inspections and each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected. The records shall be maintained for a minimum of three years and be made readily available to the Environmental Protection Commission of Hillsborough County, state, or federal agency upon request. [40 CFR 60.502(j) and Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C.]

20. Test the truck loading rack and the denatured ethanol loading station controlled by the vapor recovery unit (VRU) annually for VOC emissions, once per federal fiscal year (October 1 - September 30) with a target date of November 7. Test the truck loading rack and the denatured ethanol loading station controlled by the vapor combustion unit (VCU) each year that the VCU operates five hundred (500) hours or more, in any federal fiscal year. If the VCU operates less than five hundred hours in any given federal fiscal year, then the VCU shall be tested at least 120 days prior to submitting the permit renewal application. During the VRU test, the permittee shall monitor and record the maximum vacuum pressure and the temperature in the carbon beds, hourly, and include it in the test report. During the VCU test, the permittee shall monitor and record the hourly temperature. Submit two copies of the test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of such testing. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. and 40 CFR 60, Appendix A. [Rule 62-4.070(3) and 62-297.310, F.A.C. and Permit No. 0570083-016-AC]

21. In order to ensure compliance with Specific Condition No. 20, the following conditions shall apply: [40 CFR 60.503(c) and 40 CFR 60.503(d)(2) and Rule 62-297.440(2)(b), F.A.C.]

A) Testing of emissions shall be accomplished in accordance with 40 CFR 60 Subpart XX – *Standards of Performance for Bulk Gasoline Terminals*.

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- B) The permittee shall stop loading to any tanker truck which leaks at a level greater than defined in Specific Condition No. 30. Testing shall be accomplished under the normal leak check program, and no special provisions shall be made on the date of the compliance test to exclude loading of leaking trucks. Testing shall be conducted just prior to any scheduled maintenance on the control equipment. The percent of leaking trucks found on the test date and the recent maintenance records for the control equipment shall be submitted with the test report. Failure to include the actual process rate in the results may invalidate the test.
- C) The performance test shall be 6 hours long during which at least 302,800 liters (80,000 gallons) of gasoline is loaded. If this is not possible, the test may be continued the same day until 302,800 liters (80,000 gallons) of gasoline is loaded or the test may be resumed the next day with another complete 6-hour period. In the latter case, the 302,800 liters (80,000 gallons) criterion need not be met. However, as much as possible, testing should be conducted during the 6-hour period in which the highest throughput normally occurs.
- D) If the vapor processing system is intermittent in operation, the performance test shall begin at a reference vapor holder level and shall end at the same reference point. The test shall include at least two startups and shutdowns of the vapor processor. If this does not occur under automatically controlled operations, the system shall be manually controlled.
- E) During the performance test, the pressure shall be recorded every 5 minutes while a gasoline truck is being loaded; the highest instantaneous pressure that occurs during each loading shall also be recorded. Every loading position must be tested at least once during the performance test.
- F) The emission rate (E) of total organic compounds shall be computed using the following equation: [40 CFR 60.503(c)(3)]

$$E = K \sum_{i=1}^n (V_{esi} C_{ei}) \left( L 10^6 \right)$$

where:

E = emission rate of total organic compounds, mg/liter of gasoline loaded.

$V_{esi}$  = volume of air-vapor mixture exhausted at each interval "i", scm.

$C_{ei}$  = concentration of total organic compounds at each interval "i", ppm.

L = total volume of gasoline loaded, liters.

n = number of testing intervals.

i = emission testing interval of 5 minutes.

K = density of calibration gas,  $1.83 \times 10^6$  for propane and  $2.41 \times 10^6$  for butane, mg/scm.

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G) The performance test shall be conducted in intervals of 5 minutes. For each interval “i”, readings from each measurement shall be recorded, and the volume exhausted ( $V_{esi}$ ) and the corresponding average total organic compounds concentration ( $C_{ei}$ ) shall be determined. The sampling system response time shall be considered in determining the average total organic compounds concentration corresponding to the volume exhausted.

22. Immediately before the performance test specified in Specific Condition Nos. 20 and 21, the permittee shall use EPA Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The owner or operator shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test. [40 CFR 60.503(b) and Rule 62-4.070(3), F.A.C.]

23. Compliance with the Specific Condition Nos. 9, 20, 22, and 25 shall be determined using EPA Methods 2A or 2B as appropriate, 21, 25A or 25B, or 27 contained in 40 CFR 60, Appendix A and adopted by reference. Test Methods 25A or 25B shall be conducted on the VRU and VCU. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C., and 40 CFR 60, Appendix A. [40 CFR 60.503(c)(6), Rule 62-4.070(3) and 62-297, F.A.C.]

24. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted. [Rule 62-297.310(7)(a)9., F.A.C.]

25. The tank truck vapor tightness documentation required in Specific Condition No. 10 shall be updated at least once per year to reflect current test results as determined by EPA Method 27. This documentation shall include, as a minimum, the following. The documentation shall be kept at the facility in a permanent form or at an off-site location provided that the terminal owner or operator is able to make a copy of the tank truck vapor tightness documentation (e.g., via facsimile from the off-site location) available for inspection during the course of the Agency's site visit; otherwise, the owner or operator must make available a copy of the tank truck vapor tightness documentation to the inspector within a mutually agreeable timeframe: [40 CFR 60.505(b) and (e) and Rule 62-4.070(3), F.A.C.]

- A) Test Title: Gasoline delivery tank pressure test-EPA reference Method 27
- B) Tank Owner and Address
- C) Tank Identification Number
- D) Test Location
- E) Date of Test
- F) Tester Name and Signature
- G) Witnessing Inspector (if any): Name, Signature and Affiliation
- H) Test Results: Actual pressure change in 5 minutes, mm of water (average for 2 runs)

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26. The permittee shall maintain records of each monthly leak inspection required by Specific Condition No. 32 for at least three (3) years and shall include, as a minimum, the following. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state, or federal air pollution agency upon request: [40 CFR 60.505(c) and Rules 62-4.070(3) and 62-4.160(14) F.A.C.]

- A) Date of Inspection
- B) Areas where leak inspection was performed
- C) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak)
- D) Leak Determination Method
- E) Corrective Action (Date each leak repair of; Reasons for repair interval in excess of 25 days)
- F) Inspector Name and Signature

27. Compliance with Specific Condition Nos. 9, 18, and 19 shall be demonstrated through the use of a daily and monthly recordkeeping system. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state, or federal air pollution agency upon request and shall remain onsite for at least three (3) years. The records shall include, but not limited to, the following: [40 CFR 60.505(f), Rule 62-4.070(3) and 62-4.160(14), F.A.C. and Permit No. 0570083-016-AC]

- A) Day, Month, Year
- B) Monthly amount and type of VOL loaded into trucks at the truck loading rack and at the denatured ethanol station, (gallons)
- C) Record the hours of operation for the VCU
- D) Twelve month rolling total of B) and C) above
- E) Record weekly the maximum vacuum pressure reached at each VRU carbon bed during the regeneration cycle.
- F) Record weekly the temperature of each VRU carbon bed (<sup>o</sup>F).
- G) Record all incidents where the maximum vacuum for the carbon beds is below the 26 inches mercury or the maximum average vacuum pressure obtained during the most recent annual compliance stack test.
- H) Record all incidents where the carbon beds' temperature is higher than 130<sup>o</sup>F or 10% above the operating temperature recorded during the last successful compliance test.
- I) Records of inspections and preventative maintenance performed on the VRU and VCU.
- J) Records of all replacements or additions of components performed on the VRU and VCU.
- K) Records of the monthly leak detection inspections required by Specific Condition No. 19.

28. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Environmental Protection Commission of Hillsborough County for longer duration. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or

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any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. [Rule 62-210.700(1) and (4), F.A.C. and Permit No. 0570083-016-AC]

29. 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 62-4.070(3) and 62-297.310(7)(b), F.A.C.]

30. 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.]

31. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. [Rule 62-296.320(4)(c), F.A.C.]

32. The permittee shall not store, handle, process, or use in any process the volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems as follows and as deemed necessary and ordered by the Environmental Protection Commission of Hillsborough County: [Rule 62-296.320(1)(a), F.A.C.]

- A) Maintain tightly fitting cover, lids, etc. on all containers when they are not being handled, tapped, etc.
- B) Where possible and practical procure/fabricate a tightly fitting cover for any open trough, basin, etc. of VOC so that it can be covered when not in use.
- C) Immediately attend to all spill/waste as appropriate.

33. 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(205), 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: [40 CFR 60.15 and Rules 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.
- C) Increasing facility wide throughput or increasing the loading rack throughput.

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D) Installing an additional loading arm or storage tank.

\*Not applicable to routine maintenance, repair, or replacement of component parts of an emission unit. The cost of replacement of component parts in an emissions unit shall count toward the fixed capital cost for reconstruction.

34. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION  
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.  
Executive Director

