

FINAL DETERMINATION

FOR

Kinder Morgan/Central Florida Pipeline LLC (KM/CFPL)

Tampa Terminal

Hillsborough County

Construction Permit

Application Number

0570085-024-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

October 22, 2012

The Environmental Protection Commission of Hillsborough County mailed a public notice package on September 28, 2012 that included the Intent to Issue Air Construction Permit No. 0570085-024-AC to Kinder Morgan/Central Florida Pipeline LLC (KM/CFPL), Tampa Terminal, located at 2101 GATX Drive, Tampa, Florida 33605. This construction permit authorizes the facility to modify the throughput condition for the Miscellaneous Tanks Group (EU 013) and to update the process description to reflect the receipt of ethanol via pipeline. This modification will increase operational flexibility for the tanks within this group without impacting the existing VOC emission limit.

The Public Notice of Intent to Issue was published on October 6, 2012 in the Tampa Bay Times.

No comments have ever received from public since the Intent was published.

On October 2, 2012, Christopher Fleck, P.E. with KM/CFPL sent an e-mail to EPC staff and requested some minor changes, such as typo or permit condition references, in the Draft AC Permit. After reviewing, the change has been made and reflected in the Final AC Permit.

The final action of the Environmental Protection Commission of Hillsborough County is to issue the final permit.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Clint Lonon
Operation Manager – Florida Area
Kinder Morgan/Central Florida Pipeline LLC (KM/CFPL)
2101 GATX Drive
Tampa, FL 33605

Dear Mr. Lonon:

Re: Hillsborough County - AP

Enclosed is Permit Number 0570085-024-AC to modify the throughput condition for the Miscellaneous Tanks Group (EU 013) and to update the process description to reflect the receipt of ethanol via pipeline, at your facility located at 2101 GATX Drive, Tampa, FL, Hillsborough County, 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, 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.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

RDG/KRZ/krz

Central Florida Pipeline LLC
Tampa, FL 33605

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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.

Clerk Stamp

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:

Kinder Morgan/Central Florida Pipeline LLC
Tampa Terminal
2101 GATX Drive
Tampa, FL 33605

PERMIT/CERTIFICATION

Permit No.: 0570085-024-AC
County: Hillsborough
Expiration Date: 12/15/2013
Project: Modification – Process Description and
Miscellaneous Tanks Group

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 Air Construction (AC) permit authorizes KM/CFPL Tampa Terminal to replace the throughput limits with a VOC emission limit for the Miscellaneous Tanks Group (EU 013) and to update the process description to reflect the receipt of ethanol via pipeline.

KM/CFPL Tampa Terminal is a bulk gasoline facility which stores and handles gasoline, jet fuel, diesel fuel, biodiesel fuel, ethanol, additives, and other volatile organic products (VOLs) in floating roof and fixed roof storage tanks. These products are delivered by either ship, railcar or pipeline. The products are subsequently loaded into railcars, trucks, or barges for shipment offsite or can be transferred offsite via two pipelines. The operations at this facility include 45 permitted storage tanks; degassing of the storage tanks; a barge loading operation; four loading racks; a Vapor Recovery Unit (VRU); and an open flame flare unit (OFFU). The storage tanks (EUs 001, 002, 007, 008, 009, 013, and 015) include the gasoline floating roof group tanks, jet fuel group tanks, biodiesel group tanks, additive group tanks, PCW (Petroleum Contact Water) group tanks, ethanol group tanks, and miscellaneous group tanks. Each tank group is subject to various operating restrictions such as throughput, products stored, and product vapor pressure.

The facility has four loading racks: Truck Loading Racks T/T Area Nos. 1, 2A, 3 and 7. Truck Loading Rack T/T Area No. 1 has one loading arm. Truck Loading Rack T/T Area No. 2A has four (4) loading arms. Truck Loading Racks T/T Area Nos. 1 and 2A are permitted to load biodiesel and other volatile organic products into trucks or railcars for shipment offsite. VOC emissions from the Truck Loading Racks T/T Area Nos. 1 and 2A are controlled using submerged filling techniques.

According to the current Title V Operating Permit No. 0570085-023-AV, there are 5 storage tanks

(Tanks 101, 102, 205, 401 and Surge Tank) listed under the EU 013. This AC modification will replace the throughput limits for each storage tank under the EU 013 with the requirement to maintain monthly throughput records for each storage tank, and calculate VOC emissions on a 12-month rolling basis to meet the permitted VOC emission limit of 6.7 TPY, for this EU. This proposed modification will increase operational flexibility for the tanks within this group without impacting the existing VOC emission limit.

The Surge Tank is a liquid storage tank which serves as a pressure relief vessel for the product transfer piping within the KM/CFPL Tampa Terminal. When product transfer operations are inactive, the pressure within product transfer lines can build up due to daily temperature fluctuations, especially during summer months. When the pressure within the piping exceeds specified thresholds, the pressure relief valves open and fuel from the product transfer piping is transferred to the surge tank. The liquids from pressure relief events are the only source of throughput for the surge tank.

The loading racks under EU 017 are subject to Rule 62-296.320, F.A.C. and the NSPS, 40 CFR 60, Subpart XX, and the VRU and OFU at EU 017 are subject to Compliance Assurance Monitoring (CAM) requirements of 40 CFR, Part 64 in order to provide reasonable assurance of compliance with the 10 mg/l limit. Since the facility is not a major source of HAP emissions, it is not subject to 40 CFR 63 Subpart R – National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) or 40 CFR 63 Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline). In addition, the Barge Loading operation, which involves the handling of diesel, jet, bio-diesel, additives, or other low volatile petroleum or organic liquids with a true vapor pressure less than 1.5 psia, is exempted from the requirements of 40 CFR 63, Subpart Y – National Emission Standards for Marine Tank Vessel Loading Operations.

Location: 2101 GATX Drive, Tampa

UTM: 17-358.0E 3088.7N

Facility NO: 0570085

EU ID: 013 – Miscellaneous Tanks Group

References Permit Nos.: 0570085-022/023-AC/AV

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SPECIFIC CONDITIONS:

Facility-wide 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, F.A.C.]
5. In order to limit the potential to emit (PTE), the maximum volatile organic compound (VOC) emissions for the facility shall not exceed 191.2 tons per twelve consecutive month period.
[Rule 62-4.070(3), F.A.C. and Air Construction (AC) Permit No. 0570085-022-AC]
6. As requested by the permittee, in order to demonstrate compliance with the exemption from 40CFR63 Subpart R (NESHAP for Gasoline Distribution Facilities), the following limitations shall apply:
[40 CFR 63.420(d), Rule 62-4.070(3), F.A.C. and AC Permit No. 0570085-022-AC]
 1. The 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, or less than 25 tons in any 12 consecutive month period for any combination of HAP.
 2. Handle gasoline with an average annual MTBE (a HAP) not to exceed 4 percent, based on volumes of product accepted at the facility.
7. 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)(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.

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- C) Immediately attend to all spills/waste as appropriate.
- D) Operate the VRU at all times when loading VOLs, and operate the OFU when the VRU is down for maintenance or repair.
- E) The VRU/OFU shall be maintained in good working order.

8. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility 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, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include, but not limited to, 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, buildings and work areas under the control of the permittee.
- C) Reduce vehicular speed. Post limits, if necessary.

9. The permittee must submit to the Environmental Protection Commission of Hillsborough County each calendar year, a completed DEP Form 62-210.900(5), "Annual Operating Report (AOR) for Air Pollutant Emitting Facility", for the preceding calendar year. The AOR shall be submitted by April 1 of the following year. [Rule 62-210.370(3), F.A.C.]

10. 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 may include, and are not limited to the following, and may also require prior authorization before implementation:
[Rules 62-4.060, 62-4.070(3) and 62-210.300, F.A.C.]

- A) Alteration or replacement of any equipment or major component of such equipment listed in the process description of this permit.
- B) Installation or addition of any equipment which is a source of air pollution.
- C) The storage or handling of any products other than those authorized by this permit.
- D) Increase of product throughput.

11. 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.]

12. 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 requirement or permit condition is being violated, it may require

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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 Environmental Protection Commission of Hillsborough County. [Rules 62-297.310(7)(b) and 62-4.070(3), F.A.C.]

13. A minimum of two copies of a permit application for a Title V permit revision along with three months of records in accordance with Specific Condition No. A.15.I) shall be submitted to the Environmental Protection Commission of Hillsborough County no later than 180 days prior to expiration of this permit. [Rules 62-4.070(3) and 62-213.420(1)(a)4, F.A.C.]

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SPECIFIC CONDITIONS:

SECTION A. SPECIFIC CONDITIONS FOR STORAGE TANKS

The specific conditions in this section apply to the following emissions unit(s):

EU No.	Brief Description
001	Gasoline Tank Group
002	Jet Fuel Tank Group
007	Biodiesel/Diesel Tank Group
008	Additive Tank Group
009	Petroleum Contact Water (PCW) Tank Group
013	Miscellaneous Products Tank Group
015	Ethanol Tank Group

Essential Potential to Emit (PTE) Parameters

A.1. As requested by the permitte, in order to limit the potential to emit, the following restrictions and limitations shall apply for the tank farm for any twelve (12) consecutive month period:
[Rules 62-4.070(3) and 62-210.200(239), F.A.C. and AC Permit No. 0570085-022-AC]

a) Gasoline Tank Group:

- i) Maximum potential VOC emissions shall not exceed 52.6 tons.
- ii) Maximum product throughput: 2,500,000,000 gallons
- iii) Allowable product storage: gasoline, jet fuel, diesel fuel, and other products that meet the requirements of this condition and the permit.
- iv) Maximum weighted average annual product true vapor pressure: 7.5544 psia and shall also comply with the requirements of 40 CFR 80 - Regulation of Fuels and Fuel Additives
- v) Gasoline with an average annual MTBE (a HAP) content in excess of 4 percent, based on volumes of product accepted at the facility, shall not be handled.

b) Jet Fuel Tank Group:

- i) Maximum potential VOC emissions shall not exceed 16.7 tons.
- ii) Maximum product throughput: 750,000,000 gallons.
- iii) Allowable product storage: jet fuel, diesel fuel, and other products that meet the requirements of this condition and the permit.
- iv) Maximum average annual product true vapor pressure: 0.0131 psia

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c) Biodiesel/Diesel Tank Group:

- i) Maximum potential VOC emissions shall not exceed 2.3 tons.
- ii) Maximum product throughput: 67,000,000 gallons.
- iii) Allowable product storage: biodiesel and diesel fuel and other products that meet the requirements of this condition and the permit.
- iv) Maximum average annual product true vapor pressure: 0.0184 psia

d) Additive Tank Group:

- i) Maximum potential VOC emissions shall not exceed 1.5 tons.
- ii) Maximum product throughput: 800,000 gallons.
- iii) Allowable product storage: Additives and other products that meet the requirements of this condition and the permit.
- iv) Maximum average annual product true vapor pressure: 1.20 psia

e) PCW Group Tanks:

- i) Maximum potential VOC emissions shall not exceed 7.9 tons.
- ii) Maximum product throughput: 1,000,000 gallons.
- iii) Allowable product storage: Petroleum Contact Water (PCW) and other products that meet the requirements of this condition and the permit.
- iv) Maximum average annual product true vapor pressure: 7.5387 psia.

f) Miscellaneous Products Tank Group:

- i) Maximum potential VOC emissions shall not exceed 6.7 tons.
- ii) Maximum product vapor pressure per tank shall not exceed the following:

<u>Tank Nos.</u>	<u>Max. Avg. Annual Product Vapor Pressure (psia)</u>
101	0.799
102	0.799
401	7.539
205	7.539
Surge	7.539

- iii) Allowable product storage: VOLs that have a vapor pressure of less than or equal to that specified in ii) above and which meet the requirements of this condition and the permit.

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- g) Ethanol Products Tank Group:
 - i) Maximum potential VOC emissions shall not exceed 5.5 tons.
 - ii) Maximum product throughput: 350,000,000 gallons.
 - iii) Allowable product storage: neat-ethyl alcohol, denatured ethyl alcohol and other products that meet the requirements of this condition and the permit.
 - iv) Maximum average annual product true vapor pressure: 1.236 psia.
- h) The mixing or blending of products resulting in higher vapor pressures than the tank(s) is permitted to store is not allowed.
- i) Only the tank(s) described in each group are allowed to store the products listed and other products that meet the requirements of this condition and the permit.
- j) All tanks shall be clearly identified by number.
- k) Each tank shall be maintained to retain the structure, roof type, and color characteristics described in the application.
- l) When storing a new product in an existing tank, the permittee shall take all necessary precautions to ensure that the affected tank is rid of the old product prior to storing the new petroleum liquid.

A.2. Hours of Operation. This emissions unit is allowed to operate continuously. [Rules 62-4.160(2), F.A.C. and 62-210.200(239), F.A.C., Definitions - (PTE)]

A.3. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Control Technology

A.4. Tank Nos. 205 and 401 are subject to RACT for Petroleum Liquid Storage Tanks with Internal Floating Roofs and shall comply with the following terms and conditions:
[Rules 62-4.070(3) and 62-296.508, F.A.C. and AC Permit Nos. 0570085-019/022-AC]

- a) The permittee shall ensure that there are no visible holes, tears, or other openings in the seal or seal fabric material.
- b) The permittee shall ensure that all openings, except stub drains are equipped with covers, lids, or seals such that:

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- i) The cover, lid, or seal is in the closed position at all times except on demand for sampling, maintenance, repair, or necessary operating practices; and,
- ii) Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof supports; and,
- iii) Rim vents, if provided, are set to open when the roof is being floated off the roof supports or at the manufacturer's recommended setting.

A.5. Tank Nos. 55-1, 55-2, and 80-1- are subject to RACT for Petroleum Liquid Storage Tanks with External Floating Roofs and shall comply with the following terms and conditions:

[Rules 62-4.070(3) and 62-296.516(2), F.A.C. and AC Permit Nos. 0570085-018/022-AC]

- A) No owner or operator of a petroleum liquid storage vessel subject to Rule 62-296.516, F.A.C., shall store a petroleum liquid in that vessel unless all seal closure devices meet the following requirements:
 - i) Both seals are intact and uniformly in place around the circumference of the floating roof between the floating roof and tank wall; and,
 - ii) There are no visible holes, tears, or other openings in the seals or seal fabrics; and,
 - iii) For vapor mounted (primary) seals, the accumulated area of gaps exceeding 1/8 inch (0.32 cm) in width between the secondary seal and the tank wall shall not exceed 1.0 square inch per foot of tank diameter (21.2 square centimeters per meter of tank diameter); and,
- B) All openings in the external floating roof, except for automatic bleeder vents, rim space vents and leg sleeves, are:
 - i) Equipped with covers, seals, or lids in the closed position except when the openings are in actual use; and,
 - ii) Equipped with projections in the tank which remain below the liquid surface at all times; and
- C) Automatic bleeder vents are closed at all time except when the roof is floating off or landing on the roof leg supports; and,
- D) Rim vents are set to open when the roof is being floated off the leg supports or at the manufacturer's recommended setting; and,
- E) Emergency roof drains are provided with slotted membrane fabric covers or equivalent covers which cover at least 90 percent of the area of the opening.

A.6. Tank Nos. 80-1, 120-1 and 120-2 subject to 40 CFR 60 Subpart K and shall comply with the following condition:

[40 CFR 60.112, Rule 62-204.800, F.A.C. and AC Permit Nos. 0570085-018/022-AC]

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A) If the true vapor pressure of the petroleum liquid, as stored, is equal to or greater than 78 mm Hg (1.5 psia) but not greater than 570 mm Hg (11.1 psia), the storage vessel shall be equipped with a floating roof, a vapor recovery system, or their equivalents.

A.7. Tank Nos. 10-1, 80-2, 80-4, 80-5, 80-6, 80-7, 120-3 and 120-4 are subject to 40 CFR 60 Subpart Kb and shall comply with the following terms and conditions:
[40 CFR 60.112b(a), Rule 62-204.800, F.A.C. and AC Permit Nos. 0570085-018/019/022-AC]

A) Each tank shall be equipped with a fixed roof in combination with an internal floating roof meeting the following specifications:

- i) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
- ii) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
 - a) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
 - b) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
 - c) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- iii) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

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- iv) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
- v) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
- vi) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- vii) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
- viii) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- ix) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

A.8. For all tanks subject to Rule 62-296.320 as listed on Pages 3 – 5 of this permit, loading of the tank(s) shall comply with the following requirement:

[Rules 62-4.070(3) and 62-296.320(1), F.A.C. and AC Permit Nos. 0570085-018/019/022-AC]

- A) The Environmental Protection Commission of Hillsborough County deems necessary and orders the permittee to use submerged filling techniques (bottom loading) for all tanks subject to this regulation. The EPC finds submerged filling techniques as known and existing vapor emissions controls.

A.9. All ethanol unloading operations shall comply with the following terms and conditions:

[Rules 62-4.070(3) and 62-296.320(1), F.A.C. and AC Permit Nos. 0570085-019/022-AC]

- A). Barge Unloading

- i) The permittee shall use good air pollution control practices to minimize emissions.

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SPECIFIC CONDITIONS:

- ii) During each barge unloading, the pipes, valves, fittings, and associated equipment shall be inspected for leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 7 calendar days after it is detected. Notify the EPC within 24 hours if a leak is detected. A written explanation of the problem and corrective actions implemented shall be submitted in the quarterly excess emissions report required in Specific Condition B.9.
- iii) 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.
- iv) All openings on the vessel which can be closed during product unloading and storage shall be closed to the extent practical.

B). Railcar Unloading

- i) The permittee shall use good air pollution control practices to minimize emissions.
- ii) During each railcar unloading, the pipes, valves, fittings, and associated equipment shall be inspected for leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 7 calendar days after it is detected. Notify the EPC within 24 hours if a leak is detected. A written explanation of the problem and corrective actions implemented shall be submitted in the quarterly excess emissions report required in Specific Condition B.9.
- iii) All openings on the railcar which can be closed during product unloading and storage shall be closed to the extent practical.

Test Methods and Procedures

A.10. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

A.11. All emissions tests performed pursuant to Rule 62-296.508 (internal floating roofs) shall comply with the following requirements: [Rule 62-296.508(3), F.A.C. and AC Permit No. 0570085-022-AC]

- A) Internal Floating Roof and Roof Seals. The test method for volatile organic compounds shall be p. 6-2 of EPA 450/2-77-036, incorporated and adopted by reference in Chapter 62-297, F.A.C.

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B) Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.

A.12. All emissions tests performed pursuant to Rule 62-296.516 (external floating roofs) shall comply with the following requirements: [Rule 62-296.516(3), F.A.C.]

- a) The test method for volatile organic compounds shall be EPA Method 21 and p. 5-3 of EPA 450/2-78-047, incorporated and adopted by reference in Chapter 62-297, F.A.C.
- b) Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.

A.13. All emissions tests performed pursuant to 40 CFR 60 Subpart Kb (internal floating roof) shall comply with the following requirements:
[40 CFR 60.113b, Rules 62-204.800 and 62-4.070(3), F.A.C. and AC Permit Nos. 0570085-018/019/022-AC]

- A) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel. [40 CFR 60.113b(a)(1)]
- B) For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the EPC in the inspection report required in 40 CFR 60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. [40 CFR 60.113b(a)(2)]
- C) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes, and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid

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surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in 40 CFR 60.113b(a)(2) (Referenced above). [40 CFR 60.113b(a)(4)]

- D) Notify the EPC in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by 40 CFR 60.113b(a)(1) and (a)(4) (Referenced above) to afford the EPC the opportunity to have an observer present. If the inspection required by 40 CFR 60.113b(a)(4) (Referenced above) is not planned and the owner or operator could not have known about the inspection 30 days in advance of refilling the tank, the owner or operator shall notify the EPC at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the EPC at least 7 days prior to the refilling. [40 CFR 60.113b(a)(5)]

A.14. For Internal Floating Roof Tank Nos. 80-3, 10, 10-4, 11, 12, 25-1, and 25-2 subject to Rule 62-296.320, F.A.C., the permittee shall visually inspect all automatic bleeder vents and rim vents within twenty-four (24) hours of the roof either floating off or landing on the roof leg supports. [Rule 62-4.070(3), F.A.C. and AC Permit Nos. 0570085-015/016/018/019/022-AC]

Recordkeeping and Reporting Requirements

A.15. Compliance with the limitations of Specific Condition No. A.1. shall be demonstrated through the use of a monthly recordkeeping system. The recordkeeping system shall contain the following information for each tank and shall be made available to the Environmental Protection Commission of Hillsborough County, state and federal officials upon request. The records shall be maintained for the most recent five year period. [Rule 62-4.070(3) and 62-213.440(1)(b)2.b., F.A.C.]

- A) Month, Year
- B) Tank Number
- C) Product(s) stored
- D) Active and inactive service dates for each tank
- E) Each change in product storage for each tank
- F) Reid Vapor Pressure of the gasoline product(s) [ASTM Methods D-2879-83, 96, or 97 as appropriate]
- G) Monthly total of each product(s) throughput by tank (gallons)
- H) Rolling 12 (twelve) months total of each product(s) by tank (gallons)

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I) Monthly and rolling 12 (twelve) months total for VOC emissions for EU 013.

A.16. The permittee shall promptly notify (by telephone, e-mail, or fax) the Environmental Protection Commission of Hillsborough County of any abnormal event which occurs at the facility. Within thirty (30) days of this notification report, the permittee shall submit a written report detailing the following:
[Rule 62-4.070(3), F.A.C.]

- A) Tank Identification Number
- B) The Abnormal Event
- C) Corrective Action Taken

A.17. Annual seal inspections required in Specific Condition Nos. A.11., A.12., A.13., and A.14. shall be conducted and a written report shall be prepared. Annual visual observations of seals to verify compliance with A.5., A.6., and A.7 shall be conducted and a written report of corrective actions taken upon discovery of holes, tears, or other openings shall be prepared. Both reports shall be kept on site and made available upon request to the Environmental Protection Commission of Hillsborough County, state, and federal officials.
[Rule 62-4.070(3), F.A.C. and AC Permit Nos. 0570085-015/016/018/019/022-AC]

A.18. The permittee of each storage vessel subject to 40 CFR 60 Subpart Kb as specified in 40 CFR 60.112b(a) shall keep records and furnish reports as follows. The owner or operator shall keep copies of all reports and records required by this section for at least 5 years.
[40 CFR 60.115b, Rule 62-4.070(3), F.A.C. and AC Permit Nos. 0570085-019/022-AC]

- A) Keep a record of each inspection performed as required by 40 CFR 60.113b(a)(1), (a)(2), (a)(3), and (a)(4) (Specific Condition No. A.13). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). [40 CFR 60.115b(a)(2)]
- B) If any of the conditions described in 40 CFR 60.113b(a)(2) are detected during the annual visual inspection required by 40 CFR 60.113b(a)(2) (Specific Condition No. A.13), a report shall be furnished to the EPC within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made. [40 CFR 60.115b(a)(3)]
- C) After each inspection required by 40 CFR 60.113b(a)(3) (Specific Condition No. A.13) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR 60.113b(a)(3)(ii), a report shall be furnished to the Administrator within 30 days of the inspection. The report shall identify the storage

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vessel and the reason it did not meet the specifications of 40 CFR 61.112b(a)(1) or 40 CFR 60.113b(a)(3) and list each repair made. [40 CFR 60.115b.(a)(4)]

A.19. The permittee of each tank(s) subject to 40 CFR 60 Subpart Kb shall maintain records as follows for a minimum of five years unless otherwise specified:

[40 CFR 60.116b, Rule 62-4.070(3), F.A.C. and AC Permit Nos. 0570085-019/022-AC]

- a) The owner or operator of each storage vessel as specified in 40 CFR 60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. This record will be kept for the life of the source. [40 CFR 60.116b(a) and (b)]
- b) Except as provided in paragraphs 40 CFR 60.116b(f) (referenced below), the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa or with a design capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure greater than or equal to 15.0 kPa shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. [40 CFR 60.116b(c)]
- c) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below: [40 CFR 60.116b(e)]
 - i) For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
 - ii) For crude oil or refined petroleum products the vapor pressure may be obtained by the following:
 - a) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference-see 40 CFR 60.17), unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).
 - iii) For other liquids, the vapor pressure:

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- A) May be obtained from standard reference texts, or
 - B) Determined by ASTM Method D2879-83 (incorporated by reference-see 40 CFR 60.17); or
 - C) Measured by an appropriate method approved by the Administrator; or
 - D) Calculated by an appropriate method approved by the Administrator
- d) The owner or operator of each vessel storing a waste mixture of indeterminate or variable composition shall be subject to the following requirements: [40 CFR 60.116b(f)]
- i) Prior to the initial filling of the vessel, the highest maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in 40 CFR 60.116b(e) (referenced in C) above).
 - ii) For vessels in which the vapor pressure of the anticipated liquid composition is above the cutoff for monitoring but below the cutoff for controls as defined in 40 CFR 60.112b(a), an initial physical test of the vapor pressure is required; and a physical test at least once every 6 months thereafter is required as determined by the following methods:
 - A) ASTM Method D2879-83 (incorporated by reference-see 40 CFR 60.17); or
 - B) ASTM Method D323-82 (incorporated by reference-see 40 CFR 60.17); or
 - C) As measured by an appropriate method as approved by the Administrator.

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

Richard D. Garrity, Ph.D.
Executive Director