TECHNICAL EVALUATION

AND

PRELIMINARY DETERMINATION

FOR

Motiva Enterprises LLC

Hillsborough County

Construction Permit and Title V Operating Permit

Application Number

0570197-021-AC and 0570197-020-AV

Environmental Protection Commission of

Hillsborough County

Tampa, FL

February 1, 2012

Concurrent Construction/Title V Operating Permits
Permit Nos. 0570197-021-AC/0570197-020-AV

APPLICANT

The applicant for this project is Motiva Enterprises LLC. The applicant's responsible official and mailing address are: Les Millman, Motiva Enterprises LLC, P.O. Box 21108, Fort Lauderdale, FL 33335.

The professional engineer who sealed the application is: Bart Leininger, P.E., Ashworth Leininger Group, 601 East Daily Drive, Suite 302, Camarillo, California, 93010. The P.E. registration number is: 71856.

PROJECT DESCRIPTION

Attached is REVISED DRAFT Permit No. 0570197-021-AC and REVISED DRAFT/PROPOSED Permit No. 0570197-020-AV. Permit No. 0570197-021-AC identifies changes to the existing Title V permit relating to rule applicability, testing requirements and the revising of potential emissions based on updated information regarding tank specifications. Permit No. 0570197-020-AV is for renewal of the current Title V permit and includes revisions incorporating these changes. These permits are being issued concurrently since there is no new construction authorized by Permit No. 0570197-021-AC and no new compliance testing is required. Permit No. 0570197-020-AV incorporates Permit Nos. 0570197-018-AC, 0570197-019-AC, and 0570197-021-AC. The Process Description has also been updated, and the Title V permit was reformatted using latest version of the preferred Title V permit format.

The project has been assigned NEDS Source Classification Code Nos. 4-04-001-11 (Petroleum and Solvent Evaporation, Petroleum Liquid Storage (non-Refinery), Standing Losses), 4-04-001-16 (Petroleum and Solvent Evaporation, Petroleum Liquid Storage (non-Refinery), Withdrawal Losses), 4-04-001-53 (Petroleum and Solvent Evaporation, Petroleum Liquid Storage (non-Refinery), Vapor Control Unit Losses), and 4-04-001-50 (Petroleum and Solvent Evaporation, Petroleum Liquid Storage (non-Refinery), Miscellaneous Losses/Leaks: Loading Racks). The Standard Industrial Code for the project is No. 5171 (Petroleum Bulk Stations and Terminals). The project is located at 6500 West Commerce Street, Tampa, FL 33616. UTM Coordinates of the location are 17-348.0 E and 3082.0 N.

FACILITY DESCRIPTION

The applicant operates a bulk petroleum receiving and distribution facility, which is located in Hillsborough County at 6500 West Commerce Street, Tampa, Florida.

The facility receives the bulk supply of petroleum products by marine vessel, but some products can also be delivered by truck (e.g. ethanol) or drums (e.g. additives). The petroleum products are handled through enclosed piping and are stored in the tanks and redistributed by loading out to tanker trucks via a three-bay loading rack. Vapors displaced from the trucks during product loading are captured in a vapor recovery system and routed to a Vapor Recovery Unit (VRU) and/or a Vapor Combustion Unit (VCU) to reduce emissions to the atmosphere. Volatile organic compound emissions from the storage and handling of petroleum products are controlled through the use of internal and external floating roofs, bottom filling of vessels, the VRU, and the VCU. The VRU has the capacity to handle the maximum vapor flow rate from the loading rack. Vapors from the vapor recovery system can also be routed to the VCU under any operating condition and not solely when the VRU is not in service. However, the VRU is the primary control device and typically receives the emissions from the loading rack the majority of the time. The facility has access to a pipeline to the airport to transport jet fuel. The line is owned and maintained by an independent contractor.

Some of the tanks at this facility have been grouped to provide flexibility in operation. The emissions from each tank group are based on the standing and working losses from each tank in the group using the product with the highest annual average vapor pressure in that tank group. This allows storage and handling of multiple products in the same tank group as long as they don't exceed the vapor pressure of the worse-case product.

PROJECT REVIEW

The application was primarily for the renewal of the Title V operating permit, and included a request to incorporate two previously issued construction permits (Permit Nos. 0570197-018-AC and 0570197-019-AC). Construction Permit No. 0570197-018-AC was issued to add denatured ethanol as an approved product for handling within the facility's gasoline tank group and to update the status of certain equipment at the facility including the removal of two tanks (Tanks #26 and #27) and the correction of descriptions of two other tanks (Tanks #15 and #28). Construction Permit No. 0570197-019-AC was issued to modify Storage Tank #7, add Storage Tank #3, replace the former Vapor Recovery Unit (VRU), remove the bladder tank, and update the HAP speciation for the different petroleum liquids that are handled by the facility. Both construction permits also included the addition of a condition referencing the applicability of 40 CFR 63 – Subpart BBBBBB (National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities).

The application also included multiple requested changes to the existing Title V permit based on rule interpretations and updated information regarding tank specifications. The requested changes affected the overall potential emissions of the facility and included the removal of some existing requirements on the emission units; therefore, the applicant also requested that a construction permit also be processed concurrently with the Title V renewal permit in order to authorize those changes.

The changes included in the construction permit and concurrently processed Title V renewal permit are summarized as follows:

1) The Title V permit was reformatted using latest version of the preferred Title V permit format. Appendix TV-6 was replaced with new Appendix TV, and Appendices RR and TR were added to document reporting and testing requirements.
2) The potential emissions from the tanks was changed to 87.7 ton/yr based on several updates to the tank specifications used in the TANKS 4.0.9d program to calculate emissions. The updated tank parameters have been included in the tank description portion in the Process Description. Estimated emissions from periodic degassing of tanks included in EU008 and EU009 was also changed slightly based on calculations from the application.
3) Tank 98 was removed from the permit.
4) Estimated potential emissions from the oil/water separator were updated and included as part of the potential emissions from EU010.
5) Based on the application, facility-wide fugitive emissions were estimated at 1.2 ton/yr from valves, elbows, etc; therefore, a category was added to the Insignificant Activity List entitled "Fugitive Equipment Leaks".
6) Ethanol unloading and barge unloading were added to Appendix I as insignificant activities at the plant. However, Condition B.9 of the current Title V permit was edited and moved to the Facility-wide section (Condition FW8) to identify reasonable precautions for proper operation of these activities.
7) The emergency generator located at the facility has been included in Appendix ICE to ensure that the facility is aware of its potential applicability to federal rules related to internal combustion engines.
8) The propane tanks associated with the VCU were added to Appendix I.
9) The facility is now 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). Based on guidance from FDEP, although the subpart has not yet been adopted by State of Florida, the rule has been referenced in the permit and added to the Title V permit as an appendix, since it is a federally-enforceable requirement.

10) In order to comply with 40 CFR 63 – Subpart BBBBBB, the applicant elected the option to install a CEMS on the VRU outlet. The applicant requested that the CEMS be added as the method of compliance for operation of the VRU. Therefore, the permit references the addition of the CEMS and identifies its use as a method of compliance. Annual RATA testing on the CEM has also been added as a requirement in the permit.

11) The CAM Plan for the VRU was updated to remove references to the bladder tank, and remains an enforceable attachment in the Title V permit. Since a CEMS has been installed on the outlet of the VRU, the CAM Plan was updated to replace vacuum pressure monitoring with CEM monitoring as Indicator 1 in the VRU monitoring table. The hydrocarbon concentration equivalent to the 10 mg/liter emission standard and referenced in the CAM Plan is based on a comparison to actual test data from the site and will be updated periodically with new testing data.

12) The new, larger VRU is capable of handling emissions from the entire loading rack, and has been identified as the primary control device to be used during normal operations. Since the VCU has been identified as the backup control device used primarily when the VRU is unavailable due to operational or maintenance issues, and is therefore expected to operate for the minority of normal operation, the CAM Plan for the VCU was edited to remove the requirement for a minimum operating temperature and identifies the continual monitoring for presence of flame as the primary monitoring requirement.

13) Specific Condition B.1.A.) was revised to identify the maximum product vapor pressure to be handled in the gasoline tanks group. The maximum vapor pressure is stated to ensure compliance with the potential to emit limitation in the permit for the tanks and is based on the emissions calculation data from the TANKS 4.09d spreadsheets included with the application. Therefore, the limit has been updated requiring a product maximum annual weighted average RVP of 13.5 psia.

14) Specific Condition Nos. B.1 and A.3 of Permit Nos. 0570197-018-AC and -019-AC, respectively, require a maximum monthly RVP of products stored during the ozone season in accordance with the requirements from 40 CFR 80 – *Regulation of Fuels and Fuel Additives*. However, based on discussions with the Florida Department of Environmental Protection and examination of the state and federal rules, it was determined that the state of Florida has not adopted 40 CFR 80 as part of its state operating permit program. Therefore, since the state of Florida is not the permitting and enforcement authority for this federal rule, the requirements related to seasonal RVP limits were <u>not</u> included in the renewed operating permit.

15) The applicant requested removal of the requirements of 40 CFR 60 – Subpart Kb from Tank No. 10. Tank No. 10 was previously permitted by Construction Permit No. 0570197-015-AC to modify the gasoline storage tank in order to handle ethanol, as it currently does. The conversion of the tank to handle ethanol involved several changes including retrofitting with a mechanical shoe primary seal and a rim-mounted secondary seal, the application of a specialty-coating, and the addition of new piping for tank loading from trucks and tank unloading to the blending skids at the loading rack. Since the project involved new construction and the tank is still authorized to handle gasoline, it was determined that the changes could result in an increase in actual emissions and therefore constitute a modification. Therefore, the tank remains subject to 40 CFR 60 – Subpart Kb as stated in the construction permit.

16) The rule cites for conditions relating to Tank No. 12 were corrected from Rule 62-296.516, F.A.C to Rule 62-296.508, F.A.C.

17) The conditions relating to distillate, additive and contact water storage tanks were revised to indicate that the throughput limits are per tank rather than per group of tanks, similar to language already existing for the gasoline storage tanks. Accordingly, the Process Description was also updated to remove the statement that working loss emissions are based on the "worst case tank" in the group.

18) The Process Description was updated to reflect the specific types of products that can be handled by each tank group.

19) Specific Condition Nos. A.2, A.4, and A.11. of the new Title V permit were amended to include the requirements from Rule 62-296.510, F.A.C.

20) The reference to EPA Method 21 for internal floating roof tanks was removed from Specific Condition No. B.10. consistent with changes to Rule 62-296.508, F.A.C. since issuance of the previous Title V permit.

21) The requirement to handle gasoline with a 5% MTBE content or less was removed and replaced with a requirement that the facility not handle gasoline oxygenated with MTBE.

22) The requirement to monitor and record the vacuum pressure on the VRU was removed from the permit since a CEM has now been installed on the control device and daily inspections of the VRU are still required by the CAM Plan.

The facility is a major source of VOC emissions and the maximum facility-wide potential to emit for VOC emissions following the changes requested at the facility is 155.6 tons/yr. This facility is a synthetic minor source of hazardous air pollutants (HAPs). It is therefore exempt from the NESHAP, Subpart R, Gasoline Distribution Facilities. The loading rack is subject to the New Source Performance Standards (NSPS), Subpart XX. Tank Nos. 3, 7, 10 and 23 are subject to the New Source Performance Standards (NSPS), Subpart Kb. Several tanks are also subject to requirements from VOC-RACT.

DRAFT Permit Nos. 0570197-021-AC and 0570197-020-AV were issued on July 14, 2011. Comments were received from L.F. Millman (Motiva Enterprises LLC) on September 13, 2011 and Mary Whitaker on December 23, 2011. Revisions were made to the DRAFT permits based on the comments provided which resulted in significant changes that required issuance of REVISED DRAFT permits. The comments and any resulting changes are noted as follows:

1. **COMMENT:** The PE Certification Statement should be changed to reference Permit No. 0570197-020-AV rather than 0570197-013-AV.

RESPONSE: The reference to Permit No. 0570197-013-AV was to indicate the last Title V renewal permit that was issued approximately 5 years ago. The affected sentence was edited to remove the specific reference to the permit number altogether, and the following sentence was added to indicate the details of the Title V operating permits since last renewal: "*The last renewal permit was Permit No. 0570197-013-AV issued on June 6, 2006, and the current Title V operating permit, which was a revision to Permit No. 0570197-013-AV, is Permit No. 0570197-017-AV issued on September 30, 2008.*".

2. **COMMENT:** There are multiple references in the permit and associated documents specifying a limit of 5% MTBE in gasoline. The terminal does not use MTBE as an oxygenate in its fuels and the 5% MTBE reference/content limit should be deleted.

RESPONSE: The limit of 5% MTBE in the gasoline was added to the Title V permit during the last Title V permit renewal process and is currently an active limitation of Permit No. 0570197-017-AV. Since MTBE is a HAP and gasoline was frequently oxygenated using MTBE in the past, the limitation was added in order to provide assurance that the facility would not become a major source of hazardous air pollutants (HAP) and thereby be subject to additional federal rules (e.g. NESHAP - Subpart R, etc.). HAP emissions were estimated using the gasoline vapor profiles from Table C-5 from *Gasoline Distribution Industry (Stage 1) – Background Information for Proposed Standard*s (EPA-453/R-94-002a) and based on a worse-case assumption that all VOCs released from the facility had a similar profile to gasoline. Since gasoline oxygenated with MTBE is listed with an estimated 11.9% HAP to VOC percentage, a 5% limit was specified in the permit to avoid major source designation. Since the facility has indicated that they no longer use MTBE as an oxygenate, the references in the Statement of Basis, Technical Evaluation, Construction Permit and Title V permit to the 5% limit have been removed and replaced with a general requirement that: "The *permittee shall not handle gasoline*

oxygenated using MTBE". Based on this, a new HAP potential to emit (PTE) was estimated using the "normal" gasoline profile from Table C-5 which resulted in a total HAP PTE of 8.0 ton/yr and a highest single HAP PTE of 2.5 ton/yr for hexane.

3. **COMMENT:** A grammatical error was noted on Page 2 of the Statement of Basis.

RESPONSE: The Statement of Basis was edited as requested.

4. **COMMENT:** The CAM Plan from the DRAFT permit was updated to replace vacuum pressure monitoring with monitoring provisions associated with operation of the CEMS system. The proposed monitoring value of 1.1% hydrocarbon is believed to be approximately equivalent to the 10 mg/liter standard. However, in additional comments received on December 23, 2011 in response to a *PROPOSED* REVISED CAM Plan, the permittee accepted the use of a lower % hydrocarbon but requested 0.33% hydrocarbon based on a stack test performed on November 17, 2011.

RESPONSE: The updated CAM Plan specifies the outlet VOC concentration (in percent hydrocarbon) as the new primary indicator to monitor ongoing compliance with the emission limits from the permit. EPC agrees that use of a properly calibrated CEM is the most effective method for evaluating continual compliance and is appropriate as the primary indicator in the proposed CAM Plan. However, the initial response indicated that a value of 1.1% hydrocarbon by volume is the estimated equivalent value for the 10 mg/l emission limit from the permit. The comments from the permittee included background documentation from a 1998 letter from John Zink that details how the correlation between the two values was derived.

The letter explains that in order to derive an estimated equivalent emission concentration "… *it is necessary to make several assumptions* …" since the vent stream volume at standard conditions is not continuously available. Several variables that affect the vent stream volume are discussed including inlet hydrocarbon concentration, temperature, pressure, re-pressurization and purge air, and vapor growth factor. Finally, as a preface to the final recommendation of equivalent hydrocarbon concentration, the letter states:

"Based on an analysis of the attached data, it can be concluded that a continuous vent analyzer can be used as a <u>rough guideline</u> to ascertain whether the VRU is operating in compliance with the emission standard, however, <u>it should not be used as an absolute measure to determine compliance</u> because of the influence of several other operating variables."

The letter appears to derive the recommended hydrocarbon value from theoretical analysis using various scenarios. However, in order to establish the most reliable monitoring parameters for a particular emission unit with a control device, the permittee should take into account site-specific factors including the level of actual emissions as demonstrated through compliance testing relative to the compliance limitation, as specified in 40 CFR 64.3(c). Since the recommended monitoring value did not utilize actual test data from Motiva's Tampa facility, EPC does not have reasonable assurance that the suggested concentration is adequate to continually demonstrate compliance with the permitted emission limit. Therefore, the CAM Plan has been revised based on guidance from "USEPA CAM Technical Guidance Document, A.24 Carbon Absorber for VOC Control – Facility EE" dated November 29, 2010, specifically Scenario No. 2. This scenario involves a similar monitoring requirement from 40 CFR 63, Subpart R, Section 63.427(a)(1) which requires that owners/operators of terminals controlled with a VRU install a CEMS capable of measuring the VOC concentration (volume % as propane) in the VRU exhaust. The calculation approach is to multiply the VRU concentration during a successful performance test by the applicable emission limit and divide the results by the mg/liter emission rate during the test.

Based on this methodology and the data from the November 10, 2010 and November 17, 2011 stack tests on the VRU, a stack outlet concentration limit of 0.31% and 0.33% hydrocarbon, respectively, as propane averaged over a 6-hour period was derived. Based on a review of the data, a final concentration limit of **0.3% hydrocarbon** has been specified in the CAM Plan as an equivalent monitoring value of the 10 mg/liter limit specified in the permit. The use of a limit defined to one decimal point was specified in order to allow for a slightly greater range of values to be acceptable to meet compliance based on numerical rounding. The CAM

Plan was also revised to specify that this value will be updated automatically based on each subsequent successful compliance test on the VRU.

Items 10 and 11 from the Statement of Basis and Technical Evaluation have been updated based on use of the CEM and the better defined equivalent hydrocarbon concentration limit in the revised CAM Plan. The CEM is recognized as a method of compliance to demonstrate compliance with the emission standard and has been stated as such in Condition No. A.9, along with an additional reference to recordkeeping requirements for the CEM in Condition A.16. In addition, since the CEM is now an active monitoring device at the facility, a requirement to perform an annual RATA test on the CEM has been added to Condition A.11, and is to be performed in conjunction with the annual VOC emission test on the VRU in order to demonstrate compliance with the 10 mg/liter standard and to update the equivalent hydrocarbon concentration to be monitored on the CEM.

5. **COMMENT:** Specific Condition No. B.1.A)2 requires a limit of 9.4 psia for the maximum annual weighted average true vapor pressure per tank in the Gasoline Tank Group. This requirement is redundant and should be removed since there is already a requirement within this tank group to only handle products with a maximum Reid vapor pressure (RVP) of 13.5 psia.

RESPONSE: The permit renewal application requested the replacement of the RVP limit in the current permit with a maximum true vapor pressure of 11 psia. However, in order to ensure compliance with the potential to emit limitation for the tanks from the emissions calculation data from the TANKS 4.09d spreadsheets included with the application, the appropriate limits included in the DRAFT permit were 13.5 psia for maximum RVP and 9.4 psia for maximum true vapor pressure. However, in reviewing the requirements as stated in the DRAFT permit, it is agreed that the requirement to document compliance with both stated limits is somewhat redundant and can be simplified by the removal of one of the limits. Therefore, the limit of 9.4 psia for the maximum annual weighted average true vapor pressure per tank limit has been removed from Specific Condition No. B.1.A)2 from both the Title V and construction permit as requested and the RVP is now stated as a maximum annual weighted average. Item 13 of the Statement of Basis and Technical Evaluation have also been edited to document this change.

6. **COMMENT:** The first paragraph of Subsection A in the Title V permit incorrectly identified the concurrently processed construction permit as 0570197-015-AC rather than 0570197-021-AC.

RESPONSE: Both references were corrected as requested.

7. **COMMENT:** The third paragraph of Subsection A in the Title V permit stated that gasoline is loaded into trucks at the loading rack. The permittee requested clarification be added noting that other liquid products are also approved for loadout through the loading racks.

RESPONSE: The Facility Description of both the Title V permit and the construction permit were revised as follows to better clarify the products handled at the loading rack: "*The rack consists of three bays which bottom load liquid products (including gasoline, ethanol, ethanol-gasoline blends, jet kerosene, diesel, and other distillate products) into the tanker trucks at a maximum rate of 150,000 gallons per hour*."

8. **COMMENT:** The Title V permit has multiple references to various historic construction permits that appear to have been superseded but the latest construction permit. The historic construction permit references should be changed to Permit No. 0570197-021-AC.

RESPONSE: The reference to historic construction permits in a condition of the permit is to reflect the actual permits that affected any changes to that specific condition. Issuance of a newer construction permit does not automatically mean that all conditions in the permit have been superseded by the new construction permit. The reference to an older construction permit does not change for a given condition unless a new construction permit is issued and it specifically affects that specific condition. A reference to Permit No. 0570197-021-AC was already included on all conditions affected by the changes summarized in the Statement of Basis, but it is

not appropriate to identify it as part of conditions that were established previously as part of former construction permits.

9. **COMMENT:** Specific Condition Nos. A.21.E) and B.13.H) require a rolling 12-month total record to be maintained for VOC and HAP emissions. The current TANKS program is not set up to perform calculations on a 12-month rolling basis. Since the potential HAP emissions stated in the application were well below the major source threshold, and the existing tracking of vapor pressure and throughput of the petroleum products demonstrate compliance with the VOC limits, the facility requests that the records for VOC and HAP emissions be maintained on an annual basis.

RESPONSE: The requirement to maintain monthly VOC and HAP emissions was added as part of the new construction permit in order to provide available records to verify compliance with total emission limits. Since the potential HAP emissions are well below the major source threshold, and the vapor pressure and throughput of the products are documented at least monthly, the two conditions were modified to change the requirement for VOC and HAP records to be maintained annually.

10. **COMMENT:** Condition FW8.A) regarding barge unloading incorrectly references Specific Condition No. A.10 in regard to the semi-annual monitoring report. Since Subsection A is only in reference to the loading rack operations, the condition should be changed to reference the semi-annual monitoring reports required by Condition FW12.

RESPONSE: Condition FW8.A) was changed as requested.

11. **COMMENT:** Condition FW9 requires the accounting of emissions from "… periodic degassing of storage tanks" to be included in the AOR each year. In order to include the emissions from instances where floating roofs were landed but degassing did not occur, the language should be changed to "… periodic floating roof tank roof landings and/or storage tank degassings".

RESPONSE: The condition has been changed to include the emissions from roof landings on floating roof tanks. However, the suggested language from the comment was edited slightly to change the reference to "and/or" to simply "and", in order to remove the possible misinterpretation that only one of the two types of tank processes required to be documented. The affected language in the Title V permit and construction permit was changed to: "… periodic floating roof tank roof landings and storage tank degassings."

12. **COMMENT:** The permittee requested removal of Condition A.7 since the CEM on the VRU will be the formal monitoring mechanism to evaluate on-going compliance rather the existing vacuum pressure monitoring.

RESPONSE: The vacuum pressure on the VRU is considered a secondary parameter that provides an indication on whether the unit is operating as designed. However, since the CEM has been added to monitor the outlet concentration from the VRU, and the VRU is inspected daily for various checks including operating pressures in accordance with the CAM Plan, the specific requirement in the permit including permitted operating range can be removed. Therefore, Condition A.7 of the Title V permit and construction permit has been removed, and Condition A.22 was amended to remove the recordkeeping requirement for vacuum reading on the VRU.

13. **COMMENT:** Condition A.8.B)1 incorrectly references Condition A.16 rather than Condition A.17.

RESPONSE: The condition was changed as requested.

14. **COMMENT:** Regarding Condition A.8.B)1, the permittee requested the allowance to use a terminal automation system to lock out trucks with expired vapor tightness documentation. The permittee also requested that the automation system be used <u>in lieu of complying with</u> Conditions A.8.B)3-5.

RESPONSE: The use of a terminal automation system is a common industry practice and has been added as an additional method used to help ensure that gasoline is only loaded into vapor-tight gasoline tank trucks. However, the suggested language of "*In lieu of complying with Conditions A.8.B)3-5*" prior to new condition could be misinterpreted that cross-checking of tanks and notification of any nonvapor-tight gasoline tank truck

loading at the facility are not required if an automation system is used. Therefore, in order to help clarify the use of the automated system, the following language has been added to the Title V permit and construction permit:

A.8. …

B) …

6. *In order to comply with paragraphs (3) and (5) above*, the permittee is allowed to use a terminal automation system to *cross-check and* lock out trucks with expired vapor tightness documentation.

15. **COMMENT:** Condition A.9 should be modified to indicate that the CEMS is used to demonstrate compliance with the Title V and 40 CFR 63 Subpart BBBBBB emission restrictions.

RESPONSE: The second option for meeting compliance with Subpart BBBBBB was removed from the condition since it was confirmed that the facility will use the CEM to meet the Subpart BBBBBB requirements. The use of the CEM has been added as part of the CAM Plan to indicate real-time monitoring of emissions to provide compliance assurance.

16. **COMMENT:** The permittee requested that Condition A.10. include a reference to Condition FW12 since it specifically designates the submittal of semi-annual reports.

RESPONSE: The requested language was added as follows to the Title V permit and construction permit:

A.10. Excess Emissions. … The permittee shall include all excess emissions over the past six (6) months in the semi-annual monitoring report, as required by Specific Condition No. FW12, and submit the reports to the Environmental Protection Commission of Hillsborough County. [Rules 62-4.130, 62-210.700 and 62-213.440(1)(b)3.b., F.A.C.]

17. **COMMENT:** Condition A.22 requires daily records to be maintained to demonstrate compliance with Condition Nos. A.4, A.7 and A.8. Since Condition A.4 does not require daily records, and Condition A.7 has been requested to be removed from the permit as an operating parameter, the reference to these two conditions should be removed from Condition A.22.

RESPONSE: The reference to Condition A.4 in Condition A.22 has been removed from the Title V permit and construction permit as requested. Since Condition A.7 remains in the permit (See RESPONSE to COMMENT #12), it remains as a reference in Condition A.22, but language was added clarifying that records are now required on a weekly basis rather than daily.

18. **COMMENT:** Conditions A.24 and B.20 contain a reference to the federal rule subpart (Subpart BBBBBB) *attached to the permit*. The subpart, along with all the other federal subparts attached to the permit, have revision dates more recent than the attachments that were included with the DRAFT permit. The permittee requests that no copies of local or federal rules be attached to the permit since the federal regulations are periodically updated.

RESPONSE: The EPC follows guidance from the Florida Department of Environmental Protection (FDEP) which specifies that the most recent revisions to all federal rules applicable at the time of permit issuance should be included with the permit. The rules are included to ensure that the permittee is aware of all relevant requirements at the time of permit issuance and that they are readily accessible. Although the rules must remain as attachments to the permit, the permittee is responsible for monitoring updates to the federal rules and complying with any changes in accordance with the language describing said changes. The copies of federal rules included with the DRAFT permit were acquired from a FDEP standardized condition website that included some subparts that were mistakenly outdated. New attachments from the *Electronic Code of Federal Regulations* from the National Archives and Records Administration are being included with the REVISED DRAFT permit to ensure that the most recent rules are referenced. Also, the phrase "… which is attached as part of the Title V operating permit under Appendix 40 CFR 63, Subpart BBBBBB …" is being removed from

Conditions A.24 and B.20 of the Title V permit and construction permit to help prompt the permittee to check for any rule updates relating to the latest rule revision date.

19. **COMMENT:** Conditions A.25 and B.21 contain a reference to the federal rule subpart (Subpart A) as an attachment to the permit. The permittee requests that no copies of local or federal rules be attached to the permit since the federal regulations are periodically updated.

RESPONSE: The attachments must remain in accordance with FDEP guidelines (see RESPONSE to Comment #18). Although the most current rules will remain as attachments to the permit, the phrase "…(Appendix NESHAP, Subpart A - General Provisions) …" is being removed from Conditions A.25 and B.21 of the Title V permit and construction permit to help prompt the permittee to check for any rule updates relating to the latest rule revision date.

20. **COMMENT:** Condition B.11.A) specifies the use of EPA Method 21 as a test method to be used to determine volatile organic compound emissions. The permittee requested clarification as to where this method would apply for an external floating roof tank inspection.

RESPONSE: The use of EPA Method 21 and p. 5-3 of EPA 450/2/78/047 are required pursuant to Rule 62-296.516, F.A.C. for all affected external floating roof tanks. The only affected tank at Motiva's Tampa terminal is Tank 11. Method 21 requires the use of a portable VOC leak detector to determine leaks from process equipment, including valves, vents, and seals. The requirements for compliance testing from p. 5-3 of EPA 450/2/78/047 do not indicate the use of a portable leak detector for determining compliance with external floating roof seal gap areas, but rather visual inspection and prescribed seal gap measurements to ensure compliance with the maximum allowed accumulated area of gaps as required by Rule 62-296.516(2)(a)2c, F.A.C. However, a portable leak detector can be utilized as a supplement to the annual inspection and seal gap measurements to help identify higher concentrations of emissions from seal gaps potentially indicative of problems with the primary seal that may not be visible from the surface. Moreover, a portable leak detector (Method 21) should be used to evaluate all covers, seals, lids, bleeder vents, and access door seals to ensure that they are not leaking and remain fully in the closed position, as required by Rule 62-296.516(2)(a)3, F.A.C.

21. **COMMENT:** The permittee requested that the language from Condition B.16 be changed from "…inspections shall be conducted directly on the external floating roof tank …" to "inspections shall be conducted directly on the roof of the external floating roof tank …" in order to help clarify the appropriate location for seal inspections on the external floating roof tank.

RESPONSE: The condition was changed as requested.

22. **COMMENT:** The permittee requested removal of the language "…or other control equipment defects listed in Specific Condition No. B.12.C)(ii) …" from Condition B.17.C) because the phrase is redundant and confusing.

RESPONSE: The language in Condition B.17.C) is stated directly as written in 40 CFR 60.115b(a)(4). Although it is acknowledged that the referenced phrase is somewhat redundant, it is intended to ensure that the permittee is aware that other aspects of the roof inspection besides the seal observation, such as liquid accumulation on the roof or that the roof may not be resting on the liquid in the tank, must be addressed and included in a report as part of the tank inspection process. Since it is quoted directly from the federal rule, the requested edit cannot be made.

23. **COMMENT:** The CAM Plan from the DRAFT permit was updated to replace vacuum pressure monitoring with monitoring provisions associated with operation of the CEMS system. The proposed monitoring value of 1.1% hydrocarbon is believed to be approximately equivalent to the 10 mg/lit standard.

RESPONSE: See RESPONSE to Comment #4. Minor edits were also made to the proposed VCU CAM Plan including a statement that vapors can be routed to the VRU during VCU malfunction and that the VRU is recognized as the primary control device during normal operation.

24. **COMMENT:** The permittee requested that "Internal Combustion (IC) Engines" be added to Appendix I – List of Insignificant Emission Units and/or Activities.

RESPONSE: Due to the promulgation of recent federal rules, specifically 40 CFR 60 - Subpart IIII and JJJJ and 40 CFR 63 – Subpart ZZZZ, "IC Engines" cannot be added as a generic insignificant activity at the facility. Each engine must be evaluated for the applicability to these federal rules. If the federal rules do not apply to an engine, then it can be added individually as an insignificant activity assuming it meets all other criteria of Rule 62-213.430(6), F.A.C. However, if the federal rules do apply to an engine, then, per guidance from the FDEP, it does not meet the insignificant activity criteria as stated in Rule 62-213.430(6), F.A.C. because it is now subject to a federal rule. This is true even though it may meet the criteria for exemption from permitting pursuant to Rule 62-210.300(3)(a), F.A.C., which would have historically lead to a designation as an insignificant unit. Since these engines must therefore be designated as regulated emission units, Appendix ICE was created by the FDEP to identify all engines at a facility whose only requirements for compliance come from the federal rules mentioned above. As long as the manufacturer's certification statement of compliance with the federal emission limits are retained for all affected engines, then there are no additional requirements beyond any other fuel usage limits (i.e. maximum sulfur ppm levels in diesel fuel), maintenance requirements, recordkeeping requirements, etc. that are specified in those rules.

25. **COMMENT:** The permittee requested the addition of "Groundwater Wells (O2 Injection and Monitoring)" to Appendix I – List of Insignificant Emission Units and/or Activities.

RESPONSE: The addition was made to Appendix I as requested.

26. **COMMENT:** The permittee requested the addition of "Portable Diesel Generator" to Appendix ICE, and included details on the specs of the unit.

RESPONSE: Based on the information provided in the comment, this unit is a portable unit rather than a stationary unit, and therefore is not subject to 40 CFR 60 - Subpart IIII or JJJJ or 40 CFR 63 – Subpart ZZZZ. Since a portable unit is not subject to those federal rules, it can be considered an insignificant emission unit and has been added to Appendix I as follows: "Portable Diesel Generator (80 kW Triton JS80, John Deere Model 4045TF220)". However, it should be noted that although the unit appears to be mounted on a skid, it is not automatically considered a portable unit. Since the definitions of a stationary unit in the federal rules indicate that such a unit "is not mobile", any unit can be considered stationary if it is located in a single location of a facility in order to perform a dedicated operation for an extended length of time. If this John Deere generator is dedicated solely to a single operation at the site and is not routinely relocated for other operations, then it should be classified as a regulated emission unit subject to the affected federal rules.

27. **COMMENT:** The permittee requested clarification regarding the statement in Appendix ICE that the IC engines are "exempt" from the requirement to obtain a construction permit, yet Appendix I states that Title V sources don't have "exempt" units but only "insignificant" units.

RESPONSE: See RESPONSE to Comment #24. The IC engines may be declared initially "exempt" from the from the construction permit requirements from Rule 62-210.300(3), F.A.C., but they do not complete the requirements for designation as an insignificant emission unit because they are subject to federal rules.

28. **COMMENT:** The appendices of the DRAFT permit contain several federal rule subparts which were outdated and not reflecting changes associated with the most recent revisions to the rules. The permittee requests that no copies of local or federal rules be attached to the permit since the federal regulations are periodically updated.

RESPONSE: See RESPONSE to Comment #18. The attachments must remain in accordance with FDEP guidelines. Updated versions of the federal rules will be attached to the REVISED DRAFT permit.

COMMENTS ON *PROPOSED* REVISED DRAFT PERMIT RECEIVED ON DECEMBER 23, 2011.

29. **COMMENT:** The permittee requested that VOC's also be tracked annually rather than monthly since throughput and vapor pressure are monitored more frequently.

RESPONSE: See RESPONSE to Comment #9 above.

30. **COMMENT:** The permittee requested removal of the requirement to monitor vacuum pressure on the VRU since they now use a CEM.

RESPONSE: See RESPONSE to Comment #12 above.

31. **COMMENT:** The permittee noted that Conditions A.8.B.3 and 4 of the construction permit required revision to match NSPS - Subpart XX. The permittee also requested to amend language for Condition A.8.B.6.

RESPONSE: The corrections were made to the construction permit as requested, and amended language was added for Condition A.8.B.6 in both permits**.** See RESPONSE to Comment #14 above.

32. **COMMENT:** The permittee requested that the term "emission tests" be replaced with "inspections" in Conditions B.10 – B.12.

RESPONSE: The use of the term "emission tests" in Conditions B.10 and B.11 is cited directly from Rules 62-296.508, F.A.C and 62-296.516, F.A.C and therefore cannot be removed. However, since paragraph C) of each condition includes an additional reference to tank inspections, the two conditions were changed in both permits to: "All emission tests <u>and inspections</u> performed …". Since Condition B.12 is only referring to inspections and related notification requirements, the condition was changed as requested in both permits.

33. **COMMENT:** After review of a *PROPOSED* REVISED CAM Plan provided to the applicant on December 5, 2011, the permittee accepted the use of a lower % hydrocarbon but requested 0.33% hydrocarbon based on a stack test performed on November 17, 2011. The permittee also provided suggested changes to the CAM Plan regarding formatting and rearrangement of some of the language.

RESPONSE: The CAM Plan has been updated to reference a final concentration limit of **0.3% hydrocarbon** as an equivalent monitoring value of the 10 mg/liter limit specified in the permit. The use of a limit defined to one decimal point was specified in order to allow for a slightly greater range of values to be acceptable to meet compliance based on numerical rounding. See RESPONSE to Comment #4 above. The other proposed changes from the permittee were made as requested. In addition, the reference to an "excursion/reportable incident" criteria was removed, and language was added confirming that a Title V permit modification is not required when a new equivalent monitoring value is established following testing.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for concurrent processing of an air construction permit and a Title V Air Operation Permit Renewal received on: October 26, 2010.
Additional information requested on: December 22, 2010.
Application considered complete on: April 20, 2011.
DRAFT Permit Nos. 0570197-020-AV and 0570197-021-AC issued on: July 14, 2011.

PRIMARY REGULATORY REQUIREMENTS

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

This project is not subject to the requirements of Rule 62-212.400, Prevention of Significant Deterioration, F.A.C. or Rule 62-212.500, New Source Review for Nonattainment Areas, F.A.C., since this project is minor by state definition.

This project is subject to the requirements of Rule 62-212.300, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C., since it is a source of air pollution requiring a permit under this rule.

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

This project is subject to the requirements of Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C., since the facility is a potential source of particulate matter, visible emissions and odors.

This project is not subject to the requirements of Rule 62-296.401 through 62-296.417, Specific Emission Limiting and Performance Standards, F.A.C., since there is no applicable source specific category in this rule.

This project is subject to the requirements of Rule 62-296.500, Reasonably Available Control Technology for VOC and NOX Emitting Facilities, F.A.C., since there are applicable source specific categories in this rule: [Rules 62-296.508, 62-296.510, and 62-296.516, F.A.C.].

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

This project is not subject to the requirements of Rule 62-296.700, Reasonably Available Control Technology Particulate Matter, F.A.C., since there is no applicable source category.

This project is subject to the requirements of Rule 62-204.800, Federal Regulations Adopted by Reference, F.A.C., since the facility is subject to the requirements of: 1) 40 CFR 60 - Subpart Kb for several of the storage tanks, 2) 40 CFR 60 - Subpart XX for the truck loading rack operation, and 3) 40 CFR 63 - Subpart BBBBBB for the entire facility. This project is not subject to 40 CFR 63 Subpart R – National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) and 40 CFR 63 Subpart EEEE – National Emission Standards for Organic Liquids Distribution (Non-Gasoline) because the facility has throughput limits and is restricted from handling gasoline oxygenated with MTBE (a HAP), so the facility is a synthetic minor source for hazardous air pollutants emissions.

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.

SUMMARY OF EMISSIONS

Although no new construction is authorized in this construction permit, changes authorized in this construction permit did result in changes to the existing facility's potential to emit (PTE). Changes to the facility's PTE from Permit Nos. 0570197-018-AC and 0570197-019-AC are also reflected in the following table:

Emission Unit	VOC Actual Emissions*	VOC Potential Emissions	VOC Allowable Emissions
	ton/yr	ton/yr	
002 - Truck Loading Racks with a Vapor Recovery Unit and Vapor Combustor Unit	22.2	66.7	10 mg/liter
008 - Gasoline Storage Tanks	27.2	75.5**	n/a
009 - Distillate Storage Tanks	1.0	2.1**	n/a
010 - Contact Water Storage Tanks	6.9	9.8	n/a
011- Misc. (Additive) Storage Tanks	0.2	0.4	n/a
Total	57.5	154.4***	

* - Actual emissions were based on the average of facility-wide emissions from the last two consecutive calendar years (2009-2010) as submitted in the Annual Operating Reports.
** - Potential emissions from EU008 and EU009 included an estimation of emissions from periodic degassing of the storage tanks, which were based on a conservative assumption of 2 gasoline and 2 diesel storage tanks degassed per year. Emissions from degassing should be included in the Annual Operating Reports.
*** - Facility-wide PTE does not include 1.2 ton/yr from emissions from fugitive components, which have been included as an insignificant activity.

The Total HAPs PTE from the facility is 8.0 ton/yr, of which 2.5 ton/yr is hexane, based on the vapor profile for normal gasoline from Table C-5 of *Gasoline Distribution Industry (Stage 1) – Background Information for Proposed Standard*s (EPA-453/R-94-002a). Therefore, inventory of Title III pollutants for the facility is estimated to be less than 10 ton/yr individually and less than 25 ton/yr collectively.

CONCLUSION

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.

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 REVISED DRAFT permits and their conditions as stipulated (see attached).