PERMITTING MEMORANDUM
AND
TECHNICAL EVALUATION & PRELIMINARY DETERMINATION

TO: Robert C. Wong
District Air Program Administrator

FROM: Cindy Zhang-Torres, P.E.
Air Permitting Manager

DATE: 04/24/2012

SUBJECT: Draft Permit Nos.: 0810001-016-AO and 0810001-017-AC
TransMontaigne Terminals, LLC, Port Manatee Terminal

Day 90: 07/03/2012

TransMontaigne Terminals, LLC submitted an application to renew the air operation permit for their Port Manatee Terminal on February 10, 2012. The applicant also requested that Tank No. 407 be allowed to store gasoline. This tank is currently not authorized to store any product having a vapor pressure higher than that of Jet A.

I notified the application contact person, Mr. Paul Siler of TransMontaigne, by email on February 15, 2012, that a construction permit would be required to allow Tank No. 407 to store gasoline because actual emissions would increase, triggering the definition of "Modification". Mr. Siler agreed to submit a construction permit application. The EPSAP application was submitted electronically on March 22, 2012. The application fee was received on April 4, 2012.

In addition to allow Tank No. 407 to store gasoline, the construction permit also made the following major changes to the current FESOP 0810001-015-AF:

1. The structure of the permit is changed drastically due to the use of the new permit template.
2. Tank No. 407 is moved from EU No. 007 to a new emissions unit (EU No. 015 - 1 Storage Tank subject to 40 CFR 60, Subpart K). Applicable NSPS Subpart K requirements are added.
3. The description of the control device for the truck loading rack (EU No. 008) is changed from a flare to a vapor combustion unit (VCU). This control device was mistakenly identified as a flare in previous permits. Specific conditions associated with the flare are removed.
4. Tank Nos. 102, 104 and 408 are moved from EU No. 009 (NSPS Subpart Ka tanks) to EU No. 007 (non-NSPS tanks). Tank No. 412 is moved from EU No. 010 (NSPS Subpart Kb tank) to EU No. 007(non-NSPS tanks). Each of these four tanks has a fixed roof and does not store products that are subject to NSPS Subparts Ka or Kb requirements.

5. EU No. 010 is inactivated because no tank at this facility is subject to NSPS Subpart Kb.
6. Unnecessary hourly heat input limitations, hourly fuel usage limitations and annual visible emissions testing requirements for EU Nos. 001, 002, 013 and 014 (Boiler Nos. 1 & 2 and Hot Oil Heater Nos. 4 & 5) are removed. These boilers and hot oil heaters are subject to the general VE standard of 20%, therefore no routine testing is required. Historical test reports showed that these units have not had visible emissions higher than 2%. It is not necessary to continue to require the facility to conduct annual VE testing on these units. The hourly limitations are removed because they were in previous permits solely for testing purposes.

Operation Permit 0810001-016-AO renews the current operation permit and incorporates the changes made in Construction Permit 0810001-017-AC.

Potential emissions from the facility remain unchanged because the applicant did not request an increase in product throughput limitations. This memorandum, therefore, also serves as the Technical Evaluation and Preliminary Determination for the construction permit.

Tank No. 407 is already equipped with an external floating roof. No physical construction or testing is required for any of the changes made in the construction permit. Therefore the construction permit and operation permit can be issued concurrently, in one document.

I emailed Mr. Siler the working draft permit for his review and comments on April 16, 2012. Mr. Siler provided his comments the next day. His comments are incorporated in the draft permits.

The last documented compliance issue at this facility occurred in June 2009 for late submittal of the 2008 AOR.

I recommend issuance of the attached draft permits.