Florida Department of

Environmental Protection

Memorandum

TO: Rick Bradburn
THROUGH: Armando I. Sarasua, P.E.
FROM: Howard Ard
DATE: July 11, 2012
SUBJECT: Evaluation Summary for Genesis Crude Oil, L.P., Jay Station, 1130160-006-AO, Santa Rosa County

We recommend issuing a permit to Genesis Crude Oil, L.P. to operate their Jay Station facility. This permit follows 1130160-004-AF, effective July 26, 21007, and incorporates Permit 1130160-005-AC, effective July 17, 2012, which combined the Jay pipeline station and the Jay tanker truck unloading station into one facility, Jay Station, under facility ID No. 1130160.

Prior to implementation of construction permit 1130160-005-AC, the Jay pipeline station (1130160) and the Jay tanker truck unloading station (1130159) were separate Genesis Crude Oil, L.P. facilities, and operated under separate Federally Enforceable State Operating Permits: 1130160-004-AF and 1130159-005-AF, respectively. The permittee requested that the two Federally Enforceable State Operating Permits be combined into one Air Operation Permit for the Jay Station facility because the facility does not need a federally enforceable operation permit to be classified as a non-Title V source pursuant to Rule 62-210.300(2)(b)2.b., F.A.C.

Process Description.
This facility consists of two regulated emissions units: EU 001 - Pipeline Station and EU 002 - Tanker Truck Unloading Station.

Emissions Unit 001: The Pipeline Station is comprised of three external floating roof tanks and associated piping and pumps. The station receives crude oil from gathering lines originating at tanker truck unloading stations. Crude oil is pumped into holding tanks and is then pumped into an outbound pipeline.

Emissions Unit 002: The Tanker Truck Unloading Station consists of one fixed roof storage tank and associated piping and pumps. The station transfers crude oil from tanker trucks, through a pipeline, to storage tanks at the Pipeline Station.

Pollution Control Equipment. VOC emissions are controlled by floating roofs on some tanks and limits on throughput.

Emissions Unit 001: The Pipeline Station is comprised of three external floating roof tanks, 2138, 2139 and 2154. Tank 2154 is also equipped with a secondary seal.

Emissions Unit 002: The Tanker Truck Unloading Station consists of one fixed roof storage tank with no emissions controls.

Environmental Impact.

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions		Allowable Emissions
		lbs/hr	T/yr	tons/year
PM	N/A	N/A	N/A	N/A
SO2	N/A	N/A	N/A	N/A
VOC	62-296.320(1)	16.42	71.90	71.90
NOx	N/A	N/A	N/A	N/A
CO	N/A	N/A	N/A	N/A
Objectionable Odors	62-296.320(2)	N/A	N/A	None allowed off plant property
VE	62-296.320(4)(b.)	N/A	N/A	Not more than 20% opacity

Applicable Rules & Regulations. This source is regulated in accordance with Rules 62-210.300(2), 62-4.160(2), 62-4.070, 62-296.320, F.A.C.

Emissions Unit 001: The installation of the Pipeline Station's three external floating roof tanks predates promulgation of 40 CFR 60 subpart K and therefore they are not subject to EPA regulations for New Source Performance Standards for Volatile Organic Liquid Storage Vessels.

Emissions Unit 002: The Tanker Truck Unloading Station's one fixed roof storage tank is exempt from 40 CFR 60 subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels, because its capacity, limited at 73.78 m^3, is less than the Kb threshold capacity of 75 m^3.

Compliance Monitoring. Compliance inspections and records of throughput of petroleum products and emissions are required for this facility.

Compliance History. A review of annual site inspection reports for the last five years denotes the facility to be in compliance with permit requirements. The last site inspection for this facility was March 7, 2012.

Fee Summary. This is an AO2C ($750 fee) minor source with no stack test.

HA/c