TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Seaport Canaveral Corporation
555 Hwy 401
Cape Canaveral, FL 32920

Seaport Canaveral Terminal

Facility ID No. 0090219

PROJECT

Project Nos. 0090219-007-AC
0090219-006-AV
Application for Major Source Air Construction Permit and Initial Title V Air Operation Permit
Projects: Modifications (Construction Permit) and Initial Title V Permit

COUNTY

Brevard County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Central District Office
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767

February 14 and 15, 2012

Prepared by Jeff Rustin, P.E.

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. <u>Project Description:</u>

A. Applicant:

Mr. Robert Boudreaux, HSE Manager
Seaport Canaveral Corp.
555 Hwy 401
Cape Canaveral, FL 32920

Mr. Juriaan Steenland, General Manager
Seaport Canaveral Corp.
555 Hwy 401
Cape Canaveral, FL 32920

B. Professional Engineer:

Mr. Gerald J. Kissel, P.E.
2982 Buxton Ct.
Clearwater, FL 33761

C. Project Location:

Seaport Canaveral Terminal
555 Hwy 401
Cape Canaveral, FL 32920

D. Projects Summary:

The purpose of this project is to obtain to obtain an initial Title V air operation permit and a concurrent air construction permit. The construction permit authorizes modification of Tank 50-2. The fixed roof tank will be converted to an internal floating roof tank. The construction permit authorizes the installation (after-the-fact) of (2) emergency fire pumps and (2) emergency generators. Additionally, it increases the non fugitive VOC emission limit (less than 240 tons per any consecutive twelve months instead of less than 100 tons per any consecutive twelve months) and increases the allowable gasoline throughput of emission unit No. 001 from 589.4 to 772.0 million gallons. The facility currently stores petroleum liquids and fuel additives products, excluding crude oil, in twenty (20) internal floating roof (IFR) tanks with mechanical shoe seals and four (4) fixed roof tanks. The IFR tanks contain gasoline, jet fuel, diesel fuel, biofuel, ethanol, and several blend components. Three of the fixed roof tanks have heated coils to control viscosity and contain diesel and No. 6 Fuel Oil, while the other one contains diesel or marine diesel oil (MDO). One of the IFR tanks has heated coils.

The terminal uses two (2) dedicated fuel-loading racks and (2) dedicated Vapor Combustion Units to control VOC and HAP emissions during loading operations. The Marine Loading Rack transfers fuel between the storage tanks and marine vessels, while the Truck Loading Rack transfers fuel from the storage tanks to tanker trucks. The Vapor Combustion Units are assisted by natural gas and have temperature monitors at the outlets.

E. Application Information:

Application Received on: 10/24/2011
Application Complete: 10/24/2011 (no formal RAIs were sent)
Note: Meeting on December 1, 2011; Response to Questions from Meeting received December 20, 2012 (hard copies).

II. PSD Applicability for Project

The project is not subject to PSD preconstruction review.

III. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N	Comments
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	Facility is not a PSD major source.
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Loading/unloading operations could be a source of unconfined particulate matter emissions if the vapor combustion units are not functioning properly.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	Gaseous vapors are sources of VOC and odors.
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Brevard County is an attainment area for ozone.
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	Y	• EU No. 001 is subject to 40 CFR 60, Subpart A and Subpart XX. • EU No. 003 is subject to 40 CFR 60, Subpart A and Subpart Kb. • EU Nos. 004 and 007 are subject to 40 CFR 60, Subpart A and Subpart IIII. • EU No. 006 is subject to 40 CFR 60, Subpart A and Subpart Dc.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	There is no applicable source category.

Subject to:	Y/N	Comments
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)	Y	• EU No. 001 and 003 is subject to 40 CFR 63, Subpart A and Subpart BBBBBB. • EU Nos. 004 and 007 are subject to 40 CFR 63, Subpart A and Subpart ZZZZ, but only need to meet the requirements of 40 CFR 60 Subpart IIII to meet the Subpart ZZZZ requirements.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)	N	• EU 002 (Marine Loading): The applicant agreed to a reduction in the amount of gasoline loading to 419.0 million gallons/yr. (previous amount was 459.9 million gallons/yr., a decrease of 40.9 million gallons/yr.) to avoid **40 CFR 63 Subpart Y** MACT and RACT standards.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	Y	Facility is a Title V source.

IV. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (tpy)	Allowable Emissions (tpy)
VOC (**non fugitive**)	**Total Facility**	**237.97 ***	**Less than 240.0**
HAPs (total) (**non fugitive**)	**Total Facility**	**12.062* ****	**Less than 25.0**
HAP (single) (**non fugitive**)	**Total Facility**	**5.01* ****	**Less than 10.0**
HAPs (total) (**fugitive**)	**Total Facility**	**1.293* ****	
HAPs (total) (**non fugitive and fugitive**)	**Total Facility**	**13.355* ****	**Facility is not a major source of HAPs (PTE less than 25.0 tpy).**

*based on the throughput limits in the permit applications (Permit Nos. 0090219-007-AC and 0090219-006-AV). This includes the recent increase (from 84 million gallons/any consecutive 12 month period to 171.2 million gallons/any consecutive 12 month period) requested in ethanol throughput (EU 003), resulting in an increase of 0.14 tons/any consecutive 12 month period in VOC emissions.
**based on the calculations provided in the application, and the wide margin provides reasonable assurance that facility is not a major source of HAPs based on the current

throughput limits in the permits (Construction Permit and Initial Title V Air Operation Permit).

V. Federal NSPS and/or NESHAP Provisions

A. 40 CFR 60, Subpart A, General Provisions;

B. 40 CFR 60, Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units;

C. 40 CFR 60, Subpart Kb, Volatile Organic Liquid Storage Vessels;

D. 40 CFR 60, Subpart XX, Bulk Gasoline Terminals;

E. 40 CFR 60, Subpart IIII, Stationary Compression Ignition Internal Combustion Engines;

F. 40 CFR 63, Subpart A, General Provisions;

G. 40 CFR 63, Subpart BBBBBB, Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities; and

H. 40 CFR 63, Subpart ZZZZ, Stationary Reciprocating Internal Combustion Engines.

VI. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C. The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VII. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Central District, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767.Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated.