STATEMENT OF BASIS

Davison De Araujo/Citgo Petroleum Corporation
CITGO Tampa Terminal
Facility ID No. 0570016
Hillsborough County

Title V Air Operation Permit Revision
PROPOSED Permit No.: 0570016-014-AV
Revision to Title V Air Operation Permit No.: 0570016-011-AV

Citgo Tampa Terminal receives petroleum products by marine vessel. Petroleum products received by the facility include gasoline, diesel, jet fuel, and denatured ethanol. The petroleum products are stored in numerous tanks and redistributed by loading out to tanker trucks. Bottom fill method, pressure vacuum valve(s), internal and external floating roofs, and a Vapor Combustion Unit (VCU) are utilized to control the VOC emissions generated during filling and storage of the petroleum products. The permittee loads petroleum products into tanker trucks from their existing petroleum storage tanks via one four-bay loading rack (Rack #1) and one two-bay loading rack (Rack #2). All gasoline is bottom loaded into the tanker trucks at the racks. The facility also has access to the Central Florida Pipeline to transport fuel off-site as needed, and jointly operates an 8" line for transferring product to and from the neighboring gasoline terminal (currently BP Products North America, Inc.) as needed.

The storage tanks, including four (4) external floating roof gasoline tanks, two (2) internal floating roof gasoline tanks, one (1) internal floating roof denatured ethanol tank, one (1) external floating roof diesel tank, two (2) fixed roof diesel tanks, six (6) fixed roof additive tanks, and two (2) internal floating roof petroleum contact water tanks, designated under EU Nos. 003, 004, 005, 009, 010, 101 and EU No. 103 are grouped based on product stored with each group subject to various operating restrictions (e.g., product throughput, product vapor pressure). The gasoline storage tanks are Tank #s 1, 5, 11, 14, 18 and 19. The diesel storage tanks are Tank #s 12, 15, and 16. The denatured ethanol storage tank is Tank #17. The PCW tanks are Tanks WW1 and WW2.

Currently, denatured ethanol is received from ships and off-loaded through a transfer line to Tank #17 (EU No. 103). Denatured ethanol is a blend comprised of approximately 95% ethanol and 5% gasoline. From Tank #17, the denatured ethanol is transferred through blending/metering skids and injected into the unleaded gasoline loading lines at desired percentages, typically as E10 gasoline (10% of ethanol in the gasoline by volume), then pumped to the existing loading racks where the blended product is loaded into tank trucks for off-site deliveries.

VOC emissions generated by the truck loading operations are controlled through use of a VCU manufactured by John Zink Company (Model No. ZFT-3-8-50-3-3/6-3/6-X) which utilizes assist gas and air to control the temperature inside the VCU. The gasoline and diesel throughputs at the loading racks are limited as are the maximum true vapor pressures. The gasoline throughput limit is 795,454,545 gal/yr, and the throughput limit for denatured ethanol is 79,545,455 gal/yr.

Citgo Tampa Terminal is a major source of hazardous air pollutants (HAPs) and is subject to 40 CFR 63, Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations). The loading racks are subject to 40 CFR 60, Subpart XX - Standards of Performance for Bulk Gasoline Terminals and Rule 62-296.510, F.A.C. - Bulk Gasoline Terminals. Storage Tank #s 1, 5, 11, 17, 18, and 19 are subject 40 CFR 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. Storage Tank #s 17, 18, and 19, are subject to Rule 62-296.508 - Petroleum Liquid Storage. Storage Tank #s 1, 5, 11, and 14 are subject to Rule 62-296.516, F.A.C. - Petroleum Liquid Storage Tanks with External Floating Roofs.

EU No. 102 includes the fugitive leaks from equipment (e.g., valves, pumps, connectors) in gasoline service. This EU is subject to monthly leak inspections.

The facility's truck loading rack operation (EU No. 001) equipped with the VCU is subject to the Gasoline Distribution Facility NESHAP (40 CFR, Part 63, Subpart R) and is, therefore, exempt from the Compliance Assurance Monitoring (CAM) requirements of 40 CFR, Part 64.