Title V Air Operation Permit Renewal
Permit No. 0570080-030-AV

APPLICANT

The applicant for this project is Marathon Petroleum Company LP. The applicant's responsible official and mailing address are: B.R. McKain, Deputy Assistant Secretary, Marathon Petroleum Company LP, 539 South Main Street, Findlay, OH 45840.

FACILITY DESCRIPTION

The applicant operates the Tampa Light Products Terminal, which is located in Hillsborough County at 425 South 20th Street, Tampa, Florida.

The Terminal is a bulk terminal that stores and handles petroleum products and petroleum product additives. Gasoline, ethanol, distillates, and asphalt products are received via barge or tanker and stored in above ground storage tanks. All of the products are subsequently loaded into trucks for shipment offsite or can also be delivered into the pipeline owned by Central Florida Pipeline. The operations at this facility include 29 permitted storage tanks; an asphalt heater; a barge loading operation; and two truck loading racks (each loading rack consists of five loading bays, and each loading bay has 5 to 6 loading arms depending on the available arms in service), whose emissions are controlled by two Vapor Recovery Units (VRUs), Jordan Technologies Units, Model Nos. JOR JT4-11089-2X7240, and a R. A. Nichols Vapor Combustor Unit (RANE VCU), Model No. 8E27DB, Serial No. E24/B14. Each VRU contains two activated carbon beds and regeneration equipment. The RANE VCU is the backup control device for the VRUs in case of equipment malfunction or maintenance activities.

The Terminal is a major source of VOC and HAP emissions. The facility is subject to Rule 62-296.510, F.A.C. - Bulk Gasoline Terminals, and is also subject to 40 CFR 63, Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations). Also, the loading racks are subject to 40 CFR 60, Subpart XX - Standards of Performance for Bulk Gasoline Terminals, and the Asphalt Heater is subject to 40 CFR 63, Subpart DDDDD – National Emission Standard for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters. Storage Tank No. 80-19 is subject to 40 CFR 60, Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids. Storage Tank Nos. 54-22, 96-06 and 96-17 are subject to 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. All gasoline floating roof group tanks are subject to Rule 62-296.508, F.A.C. - Petroleum Liquid Storage.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Draft/Proposed Renewed Title V Air Operation Permit issued July 14, 2011
Application for a Title V Air Operation Permit Renewal received December 13, 2010
Additional Information Request dated February 11, 2011
Additional Information Response received April 20, 2011
Notice of Intent to Issue Air Permit issued July 14, 2011

Public Notice Published July 22, 2011

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).
Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).
PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.
NSPS: The facility does operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.
NESHAP: The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.
CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

PROJECT REVIEW

During the review of the application, there were several items that were discussed with the facility, which are as follows:

1. MPC requested to incorporate Permit No. 0570080-029-AC into this Title V renewal. The AC Permit, which was issued on March 14, 2011, authorized the facility to install a secondary seal on Tank No. 96-6, and convert the Tank from an external floating tank to an internal floating roof tank with a mechanical shoe primary seal and a rim mounted secondary seal.

2. During the review, in order to update the storage tank information that includes the tank number, type of product, and the type of roof and seal and number of seals for each storage tank at the Terminal, EPC staff requested additional information on the latest storage tank configuration using the latest tanks program. On April 20, 2011, the EPC received the information with Tanks 4.0.9d calculation provided by MPC's consultant, Tom Davis, P.E. with ECT, Inc. Also, in their response, MPC indicated that (3) gasoline tanks (Tank Nos. 17-31, 27-23 and 43-21) and (1) diesel tank (Tank No. 17-32) are permanently out of service. Therefore, MPC requested to remove these tanks from the permit renewal.

3. During the review, 3 diesel emergency generators and one diesel water pump were identified as possibly being subject to NSPS Subpart IIII (Compression Ignition RICE), Subpart JJJJ (Spark Ignition RICE) or NESHAP Subpart ZZZZ (RICE includes area sources of HAPs). Therefore, EPC staff requested that the facility provide the rule applicability determination, as well as the applicable requirements, for each engine. On April 20, 2011, the EPC received the information provided by MPC's consultant. As a result of the rule applicability determination, 2 diesel emergency generators are subject to the NSPS Subpart IIII, and the diesel water pump is subject to the NSPS Subpart IIII and NESHAP Subpart ZZZZ. The rule requirements will be reflected in Appendix ICE.

CONCLUSION

This project is to renew the Title V air operation permit No. 0570080-028-AV, which was issued on May 4, 2010. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.