STATEMENT OF BASIS

Dudley Tarlton/ TPSI Terminals, LLP d/b/a/ TransMontaigne Product Services, Inc.
Tampa Terminal
Facility ID No.: 0570081
Hillsborough County

Title V Air Operation Permit Renewal
PROPOSED Permit Project No.: 0570081-016-AV

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This facility receives petroleum products by marine vessel. The petroleum products are stored in the petroleum storage tanks and re-distributed by loading out to tanker trucks via loading racks, transporting through pipelines, or occasionally loading back out to barges (diesel only). The facility consists of eleven (11) storage tanks (tanks) and one (1) truck loading rack with a total of eight (8) loading bays. There is also a slop tank and petroleum contact water (PCW) tank present at the site.

Volatile organic compound (VOC) emissions from the storage and handling of petroleum products are controlled by the type of roof and selas and by limiting the product throughput and the Reid Vapor Pressures (RVP) values. VOC emissions displaced during truck loading are directed to a knock-out underground tank and routed to the vapor control system, which consists of a primary VCU and a back-up flare. The primary control device is a John Zink Enclosed Flame Hydrocarbon Vapor Combustion Unit (VCU), Model No. ZCT-3-9-50-X-2/8-2/8-X-X with natural gas assist for temperature control capable of controlling VOC emissions at or below 10 milligrams per liter of gasoline loaded. A John Zink Company Series GV-LH forced draft open flame flare serves as the back-up control device and is capable of controlling VOC emissions at or below 35 milligrams per liter of gasoline loaded.

The Tampa Terminal has access to a 10” pipeline for transporting jet fuel and diesel, and a second 16” pipeline for transporting gasoline and ethanol. The pipelines are connected to the Orlando area through the Kinder Morgan facility. The facility also has the capability of loading diesel fuel out to barges, but the activity is considered an insignificant activity due to the relatively low level of emissions generated. Also identified as an insignificant activity is the handling and storing of biodiesel through two biodiesel storage tanks.

TPSI Terminals also blends gasoline with 10% or less of ethanol product. All ethanol products enter the terminal via either marine vessel or tanker truck. The terminal has the capability of receiving either denatured or non-denatured ethanol. Denaturant is combined with non-denatured ethanol prior to storage into the storage tanks. The denaturing process occurs by metering E10 from the truck rack through a line, which has a "T" connection to the cargo line from the marine vessel to the tank. No additional blending skid is required. All ethanol stored at

Tampa terminal is denatured. The truck rack loading system has two identical high pressure pumps. The output of these pumps is pressure controlled to deliver a desired pressure and flow rate to the blending skid. The blending skid is located adjacent to the truck loading rack. The blending skid consists of eight (8) SS Oval Gear Tuthill Meters (TS20C) and eight (8) Brodie Digital Control Valves (BV88). Each valve and meter combination, on the skid, is paired with a specific gasoline meter at the truck loading rack. The ethanol is then measured and routed to that specific gasoline line. The ethanol is then injected into the gasoline line serving each of eight specific meters, at the truck rack. The ethanol enriched gasoline with a maximum of 10% ethanol (E10) is then metered as it is loaded into the truck. This entire system is computer controlled and maintains a very tight tolerance of just under 10% ethanol in all gasoline loaded. If the percentage of ethanol in the gasoline varies, even slightly, the system is designed to go into a state of alarm, which alerts the terminal operators. The entire system is monitored very closely. Inventories are balanced daily. El0 percentages are hand checked daily. Laboratory tests are done routinely. The ethanol blending activity is considered to be an insignificant activity.

Each of the tanks at this facility has been grouped to provide operatonal flexibility. Each tank group emissions are based on the working (throughput) losses from the worst tank in the group using the product with the highest annual average vapor pressure (worst case scenario) in that tank group, and the standing losses from all the tanks in each group. This will enable the facility to store and handle alternate products in the same tank group. Since the gasoline/diesel tank group has separate specified limits for gasoline and diesel, a working loss for each product was included based on the designated throughput limits. A summary of the equipment involved is outlined below:

E.U. ID No.	Brief Description
-001	**Truck Loading Rack T/T**

No.	Transport	Regulation	Control
T/T #1 & #2	Loading Rack	NSPS, Subpart XX Rule 62-296.510, F.A.C.	Primary VCU - 10 mg/l Back-up Flare - 35 mg/l (see above for details)

E.U. ID No.	Brief Description
-002	**Distillate Tank Group**

Tank No.	Roof Type	Vol. (10^3gal.)	Dimension Diameter x Height	Color	Regulation
1	VFR	3276	120 x 40	White	Rule 62-296.320, F.A.C.
2	VFR	2604	120 x 32	White	Rule 62-296.320, F.A.C.

E.U. ID No.	Brief Description
-005	**Gasoline Tank Group**

Tank No.	Roof Type-Primary/Secondary Seal	Volume (10^3gal.)	Dimension Diameter x Height	Color	Regulation
3	IFR - LM/RM	2520	120 x 32	White	Rule 62-296.508, F.A.C.
4	IFR - MS/RM	3192	120 x 40	White	Rule 62-296.508, F.A.C.

5	IFR - LM/RM	3192	120 x 40	White	NSPS, Subpart Kb
6	IFR - MS/RM	1806	90 x 40	White	Rule 62-296.508, F.A.C.
7	IFR - MS/RM	3381	120 x 40	White	NSPS, Subpart Ka
8 (8a)	IFR - MS/RM	6447	140 x 56	White	NSPS, Subpart Kb
9 (9a)	IFR - MS/RM	4738	120 x 56	White	NSPS, Subpart Kb
21 (201)	VFR (Slop Tank)	0.563	4 x 6	White	Rule 62-296.320, F.A.C.

E.U. ID No. Brief Description
-008 Additive Group Tanks

Tank No.	Roof Type	Vol. (x 10^3gal.)	Dimension Diameter x Height	Color	Regulation
20 (101)	HFR	10	8 x 27	White	Rule 62-296.320, F.A.C.

Glossary
IFR - Internal Floating Roof
VFR - Vertical Fixed Roof
HFR - Horizontal Fixed Roof
MS/RM - Mechanical Shoe Primary Seal/Rim-Mounted Secondary Wiper Seal
LM/RM - Liquid-Mounted Primary Seal/Rim-Mounted Secondary Wiper Seal

Also included in this permit are miscellaneous insignificant emissions units and/or activities. The loading rack is 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 Nos. 5, 8, and 9 are subject to 40 CFR 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels. Storage Tank No. 7 is subject to 40 CFR 60, Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids. Storage Tank Nos. 3, 4 and 6 are subject to Rule 62-296.508 - Petroleum Liquid Storage (RACT).

This facility is not a major source of hazardous air pollutants (HAPs). It is therefore, exempt from the NESHAP, Subpart R, Gasoline Distribution Facilities. However, as an area source (HAP) bulk gasoline terminal, this facility is subject to the NESHAP, Subpart BBBBBB, Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities and Gasoline Dispensing Facilities (see Specific Condition Nos. A.21 and B.23).